

EXHIBIT A

EXHIBIT A

N.V.C.V.
Vietnam Veterans of America, Inc.
Chapter #719 - "Rock Mile"

Certificate of Appreciation



Presented to

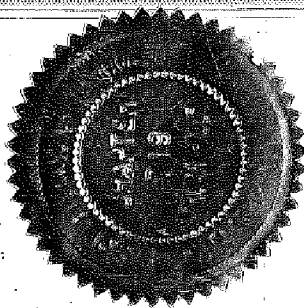
MICHAEL ANSELMO

This 11th Day of July 2001


Robert Gonzales, President
Inmate


Gregory Jax, Secretary
Inmate


Sgt. M. Moore
VVA Staff Sponsor



NNCC BADA Program

THIS IS A VERIFICATION THAT MR. MICHAEL ANSELMO #10999 SUCCESSFULLY COMPLETED THE BADA SUBSTANCE ABUSE PROGRAM #102 AT THE NORTHERN NEVADA CORRECTIONAL CENTER, SEPTEMBER 15, 1999, CLASS 99-3.

THE NNCC BADA PROGRAM IS DESIGNED TO EDUCATE INMATES IN THE CAUSES OF ADDICTIVE BEHAVIOR AND WHAT IS AVAILABLE TO HELP THE INDIVIDUAL OVERCOME THEM. THE PROGRAM UTILIZES SPECIALISTS IN VARIOUS PROFESSIONAL FIELDS AS GUEST SPEAKERS. STUDENTS ARE EXPECTED TO ATTEND EVERY CLASS, DO HOMEWORK, WATCH SUPPLEMENTAL VIDEO PROGRAMS, AND PARTICIPATE IN OPEN DISCUSSIONS.


IN ORDER TO GRADUATE, THE STUDENT MUST COMPLETE 40 CONTACT HOURS OF INSTRUCTION, ATTENDING CLASSES TWO NIGHTS PER WEEK AT THE REGIONAL MEDICAL FACILITY FOR A DURATION OF 10 WEEKS.

THE NNCC BADA PROGRAM IS FUNDED BY A GRANT, SPONSORED BY THE NNCC VIETNAM VETERANS OF AMERICA INC., CHAPTER #719. KAREN A. GEDNEY, M.D. IS THE PROGRAM FACILITATOR.

IN CLASS 99-3 THE SCHEDULE OF INSTRUCTORS & TOPICS WERE AS FOLLOWS:

KAREN A. GEDNEY, M.D.	07-06-99	MEDICAL OVERVIEW OF ADDICTION
CLIFTON MACLIN	07-08-99	HISTORICAL & SOCIETAL ASPECTS OF DRUGS
KAREN A. GEDNEY, M.D.	07-13-99	MEDICAL CONSEQUENCES OF ADDICTION
STEVEN CABRERA	07-15-99	CHOICES
CLIFTON MACLIN	07-20-99	FINANCIAL DESTINY
IDORA SILVER	07-22-99	SETTING GOALS
JIM REED	07-27-99	THE BRAIN & ADDICTION
CHARLIE STOOKEY	07-29-99	TRIGGERS & ADDICTION
GARY AILES, D.V.M.	08-03-99	SIX HUMAN NEEDS
GARY AILES, D.V.M.	08-05-99	TRIAD
GENE GIUDICE, Ph.D.	08-10-99	COPING SKILLS
JIM REED	08-12-99	RELAPSE AND RECOVERY
DON KUHL	08-17-99	ANGER MANAGEMENT
STEVEN CABRERA	08-19-99	CHOICES
CHARLOTTE FARRELL	08-24-99	STRESS MANAGEMENT
SHIRIN SCANNEL, R.N.	08-26-99	NUTRITION & REDUCING CRAVINGS
LYN BOUTILLER	08-31-99	PTSD
JOHN STEVENS, M.D.	09-02-99	PHYSIOLOGY OF ADDICTION
CHARLOTTE FARRELL	09-07-99	RELATIONSHIPS & DOMESTIC VIOLENCE
RUTH SCHOOLER, LCSW	09-09-99	COMMUNITY RESOURCES

SIGNED THIS 15TH DAY OF SEPTEMBER, IN THE YEAR 1999:


KAREN A. GEDNEY, M.D.
NNCC BADA PROGRAM FACILITATOR

DEPARTMENT OF PRISONS

**CERTIFICATE OF COMPLETION
ALCOHOL AND SUBSTANCE ABUSE**

THIS IS TO CERTIFY THAT

MICHAEL ANSELMO #10999

HAS SUCCESSFULLY COMPLETED

THE BUREAU OF ALCOHOL & DRUG ABUSE

PROGRAM #102 FOR 40 CONTACT HOURS

AWARDED THIS 9TH DAY OF SEPTEMBER,

IN THE YEAR 19 99

KAREN A. GEDNEY, M.D.

PROGRAM COUNSELOR

PROGRAM SUPERVISOR/PROGRAM DIRECTOR



Anger Management

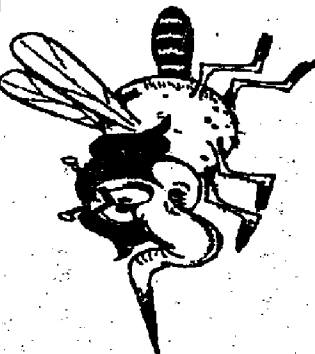
This Certificate Presented to:

☹ ☆ Michael Anselmo ☆ ☺

For Successfully Completing 12 Weeks of
Anger Management Training

From June 24, 1996 To July 29, 1996

Date: July 29, 1996



Donald A. Moldes
Donald A. Moldes, MD



STATE OF NEVADA

DEPARTMENT OF PRISONS

Certificate Awarded to

MIKE ANSELMO

FOR SUCCESSFUL COMPLETION OF
IN SERVICE TRAINING

FIRST AID CPR

Program

8

Instruction Hours

JANUARY 20, 1994
Dated

ROD ELLENBERGER EMT II

Training Officer

Pamela Johnson CRVT
Training Manager

SE0005

C.A.P.

Certificate of Achievement

This is to certify that

MIKE ANSELMIO

*has been honored for outstanding contributions,
dedication and effort.*

WNCC

Shirley M. Dyer
Director

1993
Date

[Signature]
Instructor

1993

Date

Western Nevada Community College

This certifies that

MICHAEL ANSELMO

has successfully completed a

COURSE OF INSTRUCTION

in CULINARY ARTS PROGRAM #23
Beginning Food Service Technology
Part 2 - Approaches to Basic Culinary Techniques
Granted this 1st day of May, 19 94

Anthony O. Calabro
President

Michael J. Hall
Administrator

Spencer G. Jones
Instructor

Western Nevada Community College

This certifies that

MICHAEL ANSELMO

has successfully completed a

COURSE OF INSTRUCTION

in Culinary Arts Program #23

Part 1 - Introduction to Food Service

Granted this 23rd day of December, 19 93

Anthony D. Calabro
President

Michael A. J.
Administrator

Shanda M. Spence
Instructor

ANSELMO, MICHAEL P

03/02/1952

530366154

OF 1

10/10/1994

WESTERN NEVADA COMMUNITY COLLEGE

OFFICE OF ADMISSIONS AND RECORDS • CARSON CITY, NV 8

RESIDENT NV

ASSOCIATE IN GENERAL STUDIES

12/17/1993

GRADUATED MAGNA CUM LAUDE 12/17/93

NO AMER CORRESPOND SCH -1989/01 9.0 0.00

FALL 1990

INTRO HUMAN EVOLUTION

GENERAL BIOLOGY I

BASIC PROGRAM LANG I

PRIN OF SOCIOLOGY

ERND 12.0

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ANTH 102

BIO 101

CIS 165

SOC 101

GPA

4.00

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SPRING 1991

SURV OF AM CONST HIST

GENERAL PSYCHOLOGY

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SPRING 1992

PRIN OF MICROECONOMICS

COMP AND LITERATURE

INDIAN/AMERICAN HIST

PRIN AMER CONST GOVT

HUMAN SEXUALITY

ERND 12.0

SEM

ECON 102

ENG 102

HIST 260

PSC 103

PSY 130

GPA

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3.0 A

FALL 1992

WILD WEST-MYTH & REAL

FUND OF COLLEGE MATH

PRIN OF MANAGEMENT

PRIN AMER CONST GOVT

ERND 12.0

SEM 3.75

DEAN'S HONORS LIST

HIST 275

MATH 120

MGT 201

PSC 103

GPA

3.75

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SPRING 1993

INTRO TO ADMIN JUST

COMP AND RHETORIC

ERND 3.0

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CRJ 101

ENG 101

GPA

4.00

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FALL 1993

SOCIAL & POLIT PHILOS

SOCIAL PSYCHOLOGY

ORAL COMMUNICATIONS

BEGINNING WORD PROCESSING

ERND 12.0

SEM 4.00

PHIL 207

PSY 261

SPTH 101

WP 218

GPA

4.00

3.0 I

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DEAN'S HONORS LIST

SPRING 1994

CULINARY TECH I

CULINARY TECH II

FOOD SERVICE SANITATION

ERND 9.0

SEM 4.00

FST 106

FST 108

FST 218

GPA

4.00

3.0

3.0

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GPA

3.90

ERND

63.0

SEM

CUM

***** END OF TRANSCRIPT *****

GRADING SYSTEM:

P

PASS

FAIL

W

NR

WITHDRAWAL

NOT REPORTED

UNIVERSITY OF THE FAMILY MEMORANDA:

CREDIT IS EXPRESSED IN SEMESTER UNITS. ONE SEMESTER = 15 WE

RECORD IS NOT TO BE RELEASED TO A

IS CARC STANDING UNLESS OTHERWISE INDICATED. OFFICIAL

SE0009

UNIVERSITY AND COMMUNITY COLLEGE SYSTEM OF NEVADA
WESTERN NEVADA COMMUNITY COLLEGE

HAS CONFERRED UPON

MICHAEL PHILIP ANSELMO

THE DEGREE OF

ASSOCIATE OF GENERAL STUDIES

WITH ALL THE RIGHTS AND PRIVILEGES GRANTED
IN WITNESS WHEREOF THIS DIPLOMA DULY SIGNED AND ISSUED

APPROVED BY THE BOARD OF REGENTS UPON RECOMMENDATION
OF THE COLLEGE IN THE MONTH OF DECEMBER, 1993.



Anthony J. Calabro
PRESIDENT
WESTERN NEVADA COMMUNITY COLLEGE

John A. Richardson
INTERIM CHANCELLOR
UNIVERSITY AND COMMUNITY COLLEGE SYSTEM
OF NEVADA
James Landley
CHAIRMAN
BOARD OF REGENTS

Carson City School District

Carson City, Nevada

This certifies that

Michael P. Anselmo

has satisfactorily completed a Course of Study as prescribed
by the State of Nevada for graduation from High School and
is therefore awarded this Diploma.

Given in the month of March, one
thousand nine hundred and ninety-two

Robert S. ...
Superintendent

Supervisor ...
President

James ...
Principal

Larry ...
Clerk

Presented to

Mike Anselmo

Thank You
for your participation in the
State of Nevada Campaign.



Helping Here Now
1993-1994



NORTH AMERICAN CORRESPONDENCE SCHOOLS

a division of NATIONAL EDUCATION CORPORATION

Administrative Offices and Education Service Center

Scranton, PA 18515

717-342-7701

OFFICIAL TRANSCRIPT

SCHOOL OF ANIMAL SCIENCES

PAGE 1 OF 1

MICHAEL P ANSELMO

10999

PO BOX 7000

CARSON CITY

NV 89701

ACCREDITED

by the ACCREDITING COMMISSION of the
NATIONAL HOME STUDY COUNCIL,
WASHINGTON D.C.

LICENSED

by the PENNSYLVANIA STATE BOARD OF
PRIVATE LICENSED SCHOOLS

Enroll No

19111260

Program No

1915103

Enrollment Date

2/27/89

GENERAL ANIMAL SCIENCES

Course Code	Subject	Date	
		Completed	Grade
901	BACKGROUND OF VETERINARY MEDICINE	3/21/89	100
902	HANDLING, RESTRAINT, FIRST AID/ANIMAL DATA	3/21/89	95
903	INTRODUCTORY ANATOMY & MEDICAL TERMS	4/11/89	100
904	PHYSIOLOGY & ANIMAL BREEDS	4/18/89	100
905	SHOWS, EXAMS, BANDAGING/DRESSINGS, EXOTICS	5/01/89	100
906	DRUGS, MEDICINES, VACCINATIONS, GROOMING	5/08/89	98
907	BACTERIOLOGY, PATHOL, X-RAYS, ANIMAL LAWS	5/22/89	98
908	ASSIST IN SURGERY & PRE- & POST-SURG CAR	5/23/89	98
909	PEDIATRICS, GERIATRICS, DENTAL/LAB TESTS	6/13/89	100
910	SPECIMENS, DIET, ANESTHESIA, HISTOLOGY	6/14/89	96
911	NECROPSY, MICROSCOPE, POISONOUS CREATURES	6/16/89	98

Grading Scale and Key to Symbols

Grade	Value
A	Excellent (92-100)
B	Above Average (81-91)
C	Average (75-80)
D	Passing (70-74)
F	Failing (0-69)
I	Incomplete (no credit)
EX	Excused (transfer credit)
OM	Omitted (no graded assignment)
PC	Passed Retest
W	Withdraw (no credit)

The Accrediting Commission of the National Home Study Council is approved by the U.S. Office of Education as a nationally recognized accrediting agency in accordance with Public Laws 82-550 and 85-864. The Accrediting Commission is a member of the Council on Post-Secondary Accreditation.

The above program has been rated by NACS faculty and staff as the equivalent of semester units of vocational-technical post-secondary instruction.

This is to certify that the above named student has qualified for the grades specified.

Diploma to be granted upon fulfillment of requirements.

X

Diploma granted

Robert Warwick

Robert Warwick

Director of Educational Services

08/29/90

Date

Noted

SE0013

North American School of Animal Sciences

SCRANTON, PENNSYLVANIA, 18515

This certifies that MICHAEL P. ANSELMO has completed our

GENERAL ANIMAL SCIENCES COURSE

of Home Study instruction and has satisfactorily passed all examinations and is hereby awarded this

DIPL^{MA}

as a mark of knowledge and in recognition of accomplishment.



In witness thereof, we have set our signatures
this 28TH, day of AUGUST, 19 90

Eugene Auerbach
EXECUTIVE DIRECTOR

Robert W. Jarvis
DIRECTOR OF EDUCATIONAL SERVICES

Licensed by the Pennsylvania State Board of Private
Licensed Schools
ACCREDITED by the Accrediting Commission of the National
Home Study Council. (The Accrediting Commission has been
listed by the U.S. Office of Education as a "Nationally Recog-
nized accrediting agency.")

IN THE SUPREME COURT OF THE STATE OF NEVADA

* * *

MICHAEL P. ANSELMO,

Appellant,

vs.

CONNIE BISBEE, CHAIRMAN;
SUSAN JACKSON; TONY CORDA;
ADAM ENDEL, COMMISSIONERS;
AND THE STATE OF NEVADA
BOARD OF PAROLE

Respondents.

Electronically Filed
Supreme Court No.: 07619
06/15/2016 01:47 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

**On Appeal from an Order
Dismissing Appellant Michael P.
Ansemlo's Petition for Writ of
Habeas Corpus Entered by the First
Judicial District Court**

APPELLANT MICHAEL P. ANSELMO'S
MOTION FOR LEAVE TO SUPPLEMENT THE RECORD ON APPEAL

BROWNSTEIN HYATT FARBER SCHRECK, LLP

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Las Vegas, Nevada 89106

Attorneys for Appellant Michael P. Anselmo

APPELLANT MICHAEL P. ANSELMO'S
MOTION FOR LEAVE TO SUPPLEMENT THE RECORD ON APPEAL

Appellant Michael P. Anselmo (“Michael”), by and through his attorney of record, Brownstein Hyatt Farber Schreck, LLP, hereby moves for leave to supplement the record on appeal (“Motion”). This Motion is brought pursuant to N.R.A.P. 27, the following Memorandum of Points and Authorities, all pleadings and papers already on file with the Court in this appeal, and such further arguments or evidence as the Court deems appropriate.

MEMORANDUM OF POINTS AND AUTHORITIES

I. STATEMENT OF RELEVANT FACTS¹

In May of 1972, Michael was sentenced to a term of life without the possibility of parole. (Appellate Record (“AR”) 25). Four years later, in November of 1976, Michael pled guilty to the crime of escape and was sentenced to a ten (10) year term to run consecutive to his life sentence. (AR 27). Thereafter, in 1977, he entered a guilty plea to an escape charge and was sentenced to a fixed term of ten (10) years to run consecutive to his other sentences. (AR 29). Thereafter, Michael set out on a journey of rehabilitation, education, and reformation, including participating in programs offered through the Department of Corrections and earning degrees in various fields.

¹ Unless otherwise stated, capitalized words herein shall have the same meaning as provided in Michael’s Opening Brief.

On December 14, 2005, the Board of Pardons issued an “Order Commuting Sentence” pursuant to NRS 213.010 – NRS 213.100 (“Commutation Order”). (AR31). The Commutation Order commuted Michael’s life sentence to a “term of five years to life”, and commuted Michael’s ten year sentence for his 1977 escape conviction to run concurrent therewith. (*Id*). The Commutation Order did not impact Michael’s ten-year sentence for his 1976 escape conviction. (*Id*).

Thereafter, Michael was considered for parole on four separate occasions. (AR 33-49). During the fourth parole hearing, which is the subject of this appeal, the Nevada Parole Board (“Board”) considered several mitigating and aggravating factors in making its parole determination. (AR 46). With regard to the mitigating factors, the Board elaborated on Michael’s accomplishments during his 42 years of incarceration, including: (a) receiving an Animal Science Degree in 1989; (b) earning his Adult High School Diploma in 1992; (c) earning an Associate of the Arts Degree in 1995; (d) completing an Anger Management program in 1996; (e) participating in BETA in 1999; and (f) receiving a Certification in Bio Hazards. (*Id.*) Despite the presence of these and other mitigating factors, the Board denied Michael parole. (AR 45).

On December 24, 2014, Michael filed a petition for a writ of habeas corpus against Chairman of the Board, Connie Bisbee, Commissioners Susan

Jackson, Tony Corda, and Adam Endel, and the Nevada Board of Parole (“Respondents”) in the First Judicial District Court of the State of Nevada in and for Carson City challenging the Board’s Final Denial Order (“Petition”). (AR 1). On February 13, 2015, Respondents filed a very brief motion seeking dismissal of the Petition (“Motion to Dismiss”). (AR 23-26). On March 6, 2015, the District Court signed the proposed order submitted by Respondents (“Dismissal Order”) and granted the Motion to Dismiss. (AR 55-56). The Notice of Entry of Order was filed on March 9, 2015. (AR 57).

On March 18, 2015, Michael filed a Designation of Records on Appeal, and on March 19, 2015, he filed his Case Appeal Statement, indicating that he was appealing the Dismissal Order dismissing the Petition. (AR 67-69). Upon review of the Case Appeal Statement and the record submitted by Michael, this Court determined that it was necessary for the Court to review the complete District Court record, and ordered the clerk of the District Court to transmit the same, including any presentence investigation reports. (AR 70).

On May 27, 2015, the record on appeal was filed with this Court, and upon receipt of the same, the appeal was submitted for decision. (Docket No. 15-40341). Because the District Court dismissed Michael’s Petition, Michael did not have the opportunity to submit to the District Court the documentary evidence of his academic, rehabilitative and vocational accomplishments. (*See*

Docket No. 15-36577). Consequently, such evidence was not part of the record on appeal. (Docket No. 15-40341). On June 21, 2016, Michael filed his Opening Brief. (Docket No. 16-19341).

Thereafter, undersigned counsel obtained copies of the evidentiary support for Michael's accomplishments, including, but not limited to, (i) Vietnam Veterans of America, Inc. Certificate of Appreciation, dated July 11, 2001, (ii) Verification of Completion of the BADA Substance Abuse Program, dated September 15, 1999, (iii) Certificate of Completion of Alcohol and Substance Abuse Program, dated September 9, 1999, (iv) Certificate of Completion of Anger Management Training, dated June 24, 1996, (v) two Western Nevada Community College Culinary Arts Programs Certifications of Completion, dated December 23, 1993 and May 1, 1994, (vi) Transcript from Western Nevada Community College for an Associate Degree in General Studies, dated October 10, 1994, (vii) Associate Degree in General Studies from the Western Nevada Community College, dated December, 1993, (viii) Carson City School District High School Diploma, dated March, 1992, (ix) Transcript from the North American Correspondence Schools, School of Animal Sciences, dated August 29, 1990, and (x) Diploma of General Animal Sciences Course, dated August 28, 1990 (collectively, "Supplemental Evidence"). For the Court's

convenience, attached hereto as Exhibit “A” are copies of the Supplemental Evidence, Bates Numbered SE0001 – SE0014.

The Supplemental Evidence not only corroborates the Board’s representation in the Final Denial Order that Michael completed these programs and earned several degrees, but it also provides further insight as to his positive behavior, including, but not limited to, the fact that he graduated Magna Cum Laude for his Associates Degree in General Studies and that he received an “A” in every course he completed towards his Animal Sciences Degree. (*See id.*)

As demonstrated below, the record before the Court should be supplemented to include this evidence so that the Court can meaningfully determine the issues before it on appeal.

II. ARGUMENT

As the Court is aware, “meaningful, effective appellate review depends upon the availability of an accurate record covering lower court proceedings relevant to the issues on appeal.” *Daniel v. State*, 119 Nev. 498, 508, 78 P.3d 890, 897 (2003) (quoting *Lopez v. State*, 105 Nev. 68, 84-85, 769 P.2d 1276, 1287 (1989)). Further, the “[f]ailure to provide an adequate record on appeal handicaps appellate review and triggers possible due process clause violations.” *See id.*

Here, Michael recognizes that the Supplemental Evidence was not made part of the District Court record. However, as this Court has found, supplementing the record with evidence that was not considered by the District Court is proper when such supplementation will aid the Court in making its ruling. *See Whittlesea Blue Cab Co. v. McIntosh*, 86 Nev. 609, 611, 472 P.2d 356, 357 (1970) (ordering “the record on appeal supplemented by the excluded documents to aid us in our decision on the motion.”). That is precisely the situation here.

The Supplemental Evidence directly relates to the issues on appeal *and* the Board’s parole determination in question. That is, one of the issues before the Court is whether the District Court erred in dismissing the Petition in light of the California Court’s ruling in *In re Lawrence*, 44 Cal. 4th 1181, 190 P.3d 535 (2008) that a denial-of-parole decision may be based “upon the circumstances of the offense, or upon other immutable facts such as an inmate’s criminal history, but some evidence will support such reliance only if those facts support the ultimate conclusion that an inmate continues to pose an unreasonable risk to public safety.” *See* Opening Brief, at Section IV.

In order for the Court to conduct an analysis of the same, it must examine what factors the Board considered in denying Michael parole, including his participation in rehabilitative programs, his academic accomplishments, and his

vocation training. *See In re Lawrence*, 44 Cal. 4th at 1225-26 (recounting the suitability factors considered by the board in each of its orders granting parole, including, but not limited to, the respondent's self-help, vocational and educational programs, and concluding that her participation in "rehabilitative programming specifically tailored to address the circumstances that led to her commission of the crime, including anger management programs", as well as other factors, "strongly support our view that the Governor's ultimate conclusion is not supported by some evidence.")

The Sitting Commissioners expressly considered and relied upon Michael's educational, rehabilitative and vocational accomplishments in recommending that Michael should be paroled, and, in fact, listed these accomplishments on the PRAG Form. (AR 46). The Supplemental Evidence provides this Court with evidentiary support for those accomplishments. (*See* Exhibit "A"). Thus, in order for the Court to conduct a "meaningful, effective appellate review" of Michael's Petition and the Board's parole determination, Michael should be granted leave to supplement the record with the Supplemental Evidence and the Court must be afforded the opportunity to consider the same. *See Daniel*, 119 Nev. at 508.

Further, in the event Respondents attempt to downplay these accomplishments in their Answering Brief,² the only means for Michael to combat these arguments would be by referring to the Supplemental Evidence and the specifics contained therein regarding his accomplishments, *i.e.*, earning straight A's and graduating Magna Cum Laude. *See* NRAP 28 (c) (providing that the Appellant may file a reply brief but that it “must be limited to answering any new matter set forth in the opposing brief.”); *see also In re Lawrence*, 44 Cal. 4th at 1198 (noting that the respondent received “above-average evaluations in her ‘office services’ assignment”). As such, granting Michael leave to supplement the record is appropriate.

² In the interest of providing the Respondents with an opportunity to address the Supplemental Evidence in their Answering Brief and to alleviate any possible prejudice to the Respondents, Michael brought this Motion prior to the deadline for Respondents to file their Answering Brief, as opposed to seeking leave to supplement the record in conjunction with his Reply Brief.

III. CONCLUSION

Based on the foregoing, Michael respectfully requests this Court grant him leave to supplement the record on appeal with the Supplemental Evidence.

Dated this 15th day of July, 2016.

BROWNSTEIN HYATT FARBER SCHRECK, LLP

By: /s/ Kirk B. Lenhard

Kirk B. Lenhard, Esq., NV Bar No. 1437

Emily A. Ellis, Esq., NV Bar No. 11956

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Las Vegas, NV 89106-4614

Telephone: 702.382.2101

Facsimile: 702.382.8135

klenhard@bhfs.com

cellis@bhfs.com

Attorneys for Appellant

Michael P. Anselmo

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed and served the foregoing **MOTION TO SUPPLEMENT THE RECORD** with the Clerk of the Court of the Supreme Court of Nevada by using the Court's Electronic Filing System, and via U.S. Mail, postage prepaid, on July 15, 2016 upon the following:

ADAM PAUL LAXALT
ATTORNEY GENERAL
DANIEL M. ROCHE
DEPUTY ATTORNEY GENERAL
100 NORTH CARSON STREET
CARSON CITY, NV 89701-4717

/s/ Paula Kay
an employee of Brownstein Hyatt
Farber Schreck, LLP