

**IN THE SUPREME COURT OF THE
STATE OF NEVADA**

MICHAEL PHILLIP ANSELMO,

Appellant,

vs.

STATE OF NEVADA,

Respondent.

Supreme Court No. 81382

Second Judicial District Court

Case No. 271359

Electronically Filed
Aug 30 2021 02:39 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

**UNOPPOSED MOTION TO CONTINUE IN-PERSON ORAL ARGUMENT
SCHEDULED FOR OCTOBER 13, 2021, AT 1:30 P.M.**

Sydney R. Gambee, Esq.
Nevada Bar No. 14201
Jessica E. Whelan, Esq.
Nevada Bar No. 14781
HOLLAND & HART LLP
9555 Hillwood Drive, Second Floor
Las Vegas, Nevada 89134
Tel: (702) 669-4600

Jennifer Springer
Nevada Bar No. 13767
Rocky Mountain Innocence Center
358 South 700 East, B235
Salt Lake City, UT 84102

Attorneys for Appellant Michael Phillip Anselmo

Michael Phillip Anselmo (“Appellant”), by and through his undersigned counsel of record, hereby respectfully requests a continuance and resetting of the in-person oral argument currently scheduled for October 13, 2021 at 1:30 p.m. This is the first request to continue the in-person oral argument. In support of this motion, Appellant states as follows:

1. Undersigned counsel, Sydney R. Gambee, Esq., will be the lead attorney at oral argument.

2. Ms. Gambee is currently out of the office on maternity leave and will remain on leave into October.

3. Accordingly, to afford Ms. Gambee sufficient time to prepare for oral argument, Appellant requests that oral argument be continued for a period of at least thirty days, to or after November 12, 2021.

4. On August 30, 2021, counsel for Appellant contacted Marilee Cate, counsel for Respondent, to ascertain whether counsel objects to the extension requested herein. That same day, counsel for Respondent confirmed that she does not oppose the extension requested herein.

This motion is made in good faith and not for the purpose of delay.

DATED this 30th day of August 2021.

/s/ Jessica E. Whelan

Sydney R. Gambee, Esq.

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Attorneys for Appellant Michael Anselmo

CERTIFICATE OF SERVICE

Pursuant to NRAP 25(a)(b) and 25(1)(d), I, the undersigned, hereby certify that I electronically filed the foregoing **UNOPPOSED MOTION TO CONTINUE IN-PERSON ORAL ARGUMENT SCHEDULED FOR OCTOBER 13, 2021, AT 1:30 P.M.** with the Clerk of Court for the Supreme Court of Nevada by using the Supreme Court of Nevada's E-filing system on the 30th day of August 2021.

I further certify that service of the foregoing has been accomplished to the following individuals by the methods indicated below:

- ☒ Electronic: by submitting electronically for filing and/or service with the Nevada Supreme Court's e-filing system and served on counsel electronically in accordance with the E-service list to the following listed below:

Division of Probation & Parole
Jennifer Noble, Esq.
Marilee Cate, Esq.
Appellate Division
Washoe County District Attorney
1 S. Sierra Street, South Tower, 4th
Floor
Reno, NV 89501

Keith G. Munro, Esq.
Washoe County District
Attorney's Office
1 S. Sierra Street, South
Tower, 4th Floor
Reno, NV 89501

Aaron Ford, NV Attorney General
Office of the Attorney General
State of Nevada
100 N. Carson Street
Carson City, NV 89701

- ☒ U.S. Mail: a true copy was placed in Holland & Hart LLP's outgoing mail in a sealed envelope addressed to the following:

Michael P. Anselmo
475 Cemetery Road
Trailer 60
Reno, NV 89503

/s/ Joyce Heilich

An employee of Holland & Hart LLP