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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 3:16-CR-00029-MMD-WGC

v.

RICHARD WINSTON WEST II,
Defendant.

ADDENDUM TO APPEAL
REGARDING THE BAIL MOTION
ADDITIONAL EXHIBITS

Comes now Defendant Richard Winston West II by and through her undersigned Counsel, Law Office of David R. Houston, hereby provides additional information for this Court's consideration.

It should be noted; Counsel reviewed the Government's Response to Defendant's Appeal referencing bail/detention issues. Within that Response, the Government provided a letter from a board certified physician, Steven H. Miller, M.D. Counsel provided said letter from Steven H. Miller, M.D. to a competent physician for the purposes of review. This physician, the medical director of pain medicine, as well as a board certified anesthesiologist, was sufficiently concerned at the comments of Dr. Steven H. Miller; he wrote the attached document known as Exhibit 1. As such, Counsel did not receive the same until late last night and as a consequence, is

1 filing the comments of Dr. John M. DiMuro for this Court's review prior to the hearing set at
2 9:00 a.m.

3
4 The document speaks for itself. The same can be summarized simply by setting forth he
5 finds the comments of Steven H. Miller, M.D. to be rather short sighted. It is also of note;
6 Counsel received an additional document known as a character reference letter from Kelly J.
7 Dodson. As such, Counsel wishes to attach the same for this Court's consideration as Exhibit 2.
8 Finally, Counsel received a document this morning at 7:00 a.m. upon his arrival to work from
9 Afshan West, the wife of Richard Winston West II. The same is attached as Exhibit 3.
10

11 Counsel provides the same in hopes of allowing this Court additional insight as it
12 concerns not only Mr. West and his medical condition but Mr. West as a person.
13

14 DATED this 19th day of May, 2016.

15 Respectfully submitted,
16 LAW OFFICE OF DAVID R. HOUSTON
17 432 Court Street
18 Reno, NV 89501
19 s/David R. Houston
20 David R. Houston
21 Attorney for Defendant,
22 Richard Winston West II
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CERTIFICATE OF SERVICE

The undersigned does hereby affirm that I am an Employee of the Law Office of David R. Houston and that on this date, I caused to be delivered via e-filing system a true and correct copy of the within document, Addendum to Appeal Regarding the Bail Motion Additional Exhibits, to the below-named:

James Keller, Esq.
United States Attorney's Office
100 West Liberty Street, Suite 600
Reno, Nevada 89501

DATED this 19th day of May, 2016.

/s/ Brittaney Martin
Brittaney Martin

INDEX OF EXHIBITS

1. Letter from Dr. John M. DiMuro
2. Character Letter from Kelly J. Dodson
3. Email from Afshan West, Richard Winston West's wife