

STATE OF NEW MEXICO  
COUNTY OF SANTA FE  
FIRST JUDICIAL DISTRICT  
STATE OF NEW MEXICO,  
Plaintiff,

No. D-0101-CR 202300039  
D-0101-CR 202300040

Judge Mary Marlowe Sommer

vs.

ALEXANDER RAE BALDWIN III,  
HANNAH GUTIERREZ  
Defendant.

**RUST MOVE PRODUCTIONS, LLC'S EXPEDITED MOTION FOR  
PROTECTIVE ORDER AND EXTENSION OF TIME**

COMES NOW subpoenaed nonparty Rust Movie Productions, LLC (hereinafter "Rust") by and through its counsel of record, Lewis Brisbois Bisgaard & Smith, LLP (Jessica D. Marshall and Abigail R. Wolberg), hereby submits its Motion for Protective Order.

**FACTUAL BACKGROUND**

The State filed criminal charges against Alexander Rae Baldwin (aka Alec Baldwin) on or about January 31, 2023. Almost two months later, on or about March 14, 2023, the State served a Subpoena upon Rust Movie Productions, LLC demanding the production of the following:

1. All DOCUMENTS and COMMUNICATIONS, which refer and/or identify or make reference BALDWIN for the time period.
2. All DOCUMENTS and COMMUNICATIONS in any form and or with any content that identify, refer to or relate to BALDWIN in any manner, way, and or fashion whatsoever in which and or on which the name BALDWIN does appear for the time period.
3. All DOCUMENTS in YOUR possession regarding and or relating to any COMMUNICATIONS which identify or with regard to BALDWIN for the time period.

See **Exhibit A**.

The term “time period” is defined in the Subpoena as meaning January 1, 2019 to February 28, 2023. BALDWIN is defined as Alexander Rae Baldwin III (aka Alec Baldwin); El Dorado Pictures, and “any agent, employee, director, officer, manager, representative and/or anyone acting on behalf of” Mr. Baldwin. *Id.*

As written, the State is essentially asking that Rust Movie Productions, LLC produce communications and documents created over the course of four (4) years “in any form” and which might refer to, identify, or simply relate to numerous people and entities. Originally, Rust Movie Productions, LLC was given fifteen (15) days to respond to the subpoena and, upon request, was given an additional fourteen (14) days. However, given the 1) ambiguity of the Subpoena; 2) sheer volume of possible responsive records; 3) recent changes in Rust Movie Productions, LLC’s legal team; and 4) health-related family emergency experienced by one of Rust Movie Productions, LLC’s undersigned attorneys, Rust Movie Productions, LLC requested additional time. This request was vehemently denied by the assigned special prosecutor, Kari Morrissey, whom refused “an extension of any kind” and demanded immediate production.<sup>1</sup> See **Exhibit B**.

Accordingly, Rust Movie Productions, LLC requests this Court enter a protective order related to the Subpoena, extending the time it has to respond to the Subpoena and limiting any requisite response to those items which are not unduly burdensome to Rust Movie Productions, LLC.

### **ARGUMENT**

The Court has the inherent authority to supervise and control its docket and manage the cases before it, including issuing appropriate protective orders. *See Belser v. O’Cleireachain*, 2005-NMCA-073, ¶ 3, 137, N.M. 623, 114 P.3d 303. Pursuant to 5-511 NMRA, “[a] party or an

---

<sup>1</sup> Ms. Morrissey has since requested a “partial disclosure” however the Subpoena remains in effect and no additional time has been explicitly provided for Rust Movie Productions, LLC’s complete responses thereto.

attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction.” In addition, subpoenas may be quashed or modified where they “do not allow reasonable time for compliance” or “subjects a person to undue burden”.  
*Id.*

Again, as written, the State’s Subpoena is essentially asking that Rust Movie Productions, LLC produce communications and documents created over the course of four (4) years “in any form” and which might refer to, identify, or simply relate to numerous people and entities. Such a request is over-broad and unduly burdensome. The State’s request is in violation of New Mexico Rules of Criminal Procedure 5-511(C). As such, Rust Movie Productions, LLC requests that the Court modify the subpoena, pursuant to Rule 5-511(C)(3) to clearly define and limit the items being sought in this matter. In support of this request, Rust Movie Productions, LLC states tha the subpoena does not allow reasonable time for compliance, potentially requests production of privileged or protected materials, subjects Rust Movie Productions, LLC to an undue burden, requires potential disclosure of a trade secret or other confidential research, development or commercial information. Due to the lack of reasonable time to complete a review of potentially responsive records, Rust Movie Productions, LLC is further prevented to completing a privilege log for any protected or privileged materials. As such, Rust Movie Productions, LLC requests that the court modify the subpoena to allow for a reasonable time to respond.

Rust Movie Productions, LLC has continued to diligently work on its Subpoena responses, even utilizing a third-party discovery vendor in order to attempt to more effectively and thoroughly process and review potentially responsive documents. However, clearly combing through an organization’s records for such items is a challenging and time-consuming endeavor. In addition,

the topics outlined in the Subpoena are incredibly vague, overly broad, and implicates information that could be protected and privileged as attorney-client communications, attorney opinion and work-product, and information gathered in anticipation of litigation where Rust Movie Productions, LLC and others are currently involved in several separate civil lawsuits. Responding to such a Subpoena inarguably requires thoughtful and extensive review of voluminous documents as well as the preparation of privilege logs.

As such, Rust Movie Productions, LLC reasonably requested additional time to respond to the Subpoena and, due to the State's denial of same, now reasonably seeks relief from the Court.

### **CONCLUSION**

WHEREFORE, Rust Movie Productions, LLC requests this Court enter a protective order related to the Subpoena, extending the time it has to respond to the Subpoena and produce appropriate privilege logs, and limiting any requisite response to those items which are not unduly burdensome to Rust Movie Productions, LLC; as well as award costs and for any other and further relief this Court deems just and proper.

Respectfully submitted,

LEWIS BRISBOIS BISGAARD & SMITH LLP

/s/ Jessica D. Marshall

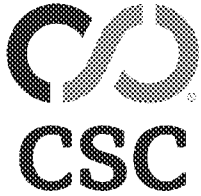
By: Jessica D. Marshall  
Abigail R. Wolberg  
Julia H. Purdy  
8801 Horizon Blvd. NE, Suite 300  
Albuquerque, New Mexico 87113  
Telephone: 505.828.3600  
Facsimile: 505.828.3900  
[Jessica.Marshall@lewisbrisbois.com](mailto:Jessica.Marshall@lewisbrisbois.com)  
[Abigail.Wolberg@lewisbrisbois.com](mailto:Abigail.Wolberg@lewisbrisbois.com)  
[Julia.Purdy@lewisbrisbois.com](mailto:Julia.Purdy@lewisbrisbois.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on April 12, 2023, I electronically filed the foregoing pleading with the Clerk of the Court by using the Odyssey File and Serve electronic filing system which will serve this pleading upon all persons who have entered appearances in this case.

*/s/ Jessica D. Marshall*

Jessica D. Marshall



## Notice of Service of Process

Transmittal Number: 26560354  
Date Processed: 03/15/2023

**Primary Contact:** Stephen R Foreht Esq.  
Foreht Associates, LLP  
228 E 45th St  
FI 17  
New York, NY 10017-3303

---

**Entity:** Rust Movie Productions LLC  
Entity ID Number 4241434

**Entity Served:** Rust Movie Productions, LLC

**Title of Action:** State Of New Mexico vs. Alexander Rae Baldwin III

**Matter Name/ID:** State Of New Mexico vs. Alexander Rae Baldwin III (13786389)

**Document(s) Type:** Subpoena

**Nature of Action:** Information/Appearence Request

**Court/Agency:** Santa Fe County District Court, NM

**Case/Reference No:** Multi-Case

**Jurisdiction Served:** New Mexico

**Date Served on CSC:** 03/14/2023

**Answer or Appearance Due:** 03/29/2023

**Originally Served On:** CSC

**How Served:** Personal Service

**Sender Information:** Mary Carmack-Altwies District Attorney  
505-827-5000

---

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

**To avoid potential delay, please do not send your response to CSC**  
251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | [sop@cscglobal.com](mailto:sop@cscglobal.com)

STATE OF NEW MEXICO  
COUNTY OF SANTA FE  
FIRST JUDICIAL DISTRICT

STATE OF NEW MEXICO,

Plaintiff,

vs.

ALEXANDER RAE BALDWIN III,  
HANNAH GUTIERREZ

No. D-0101-CR-202300039  
D-0101-CR-202300040

Defendant.

Judge Mary Marlowe Sommer

SUBPOENA DUCES TECUM

SUBPOENA FOR

SUBPOENA FOR DOCUMENTS

TO: Rust Movie Productions, LLC  
110 E. Broadway St, Hobbs, NM 88240  
c/o Corporation Service Company as agent for service of process

YOU ARE HEREBY COMMANDED TO produce at the First Judicial District Attorney's Office, 327 Sandoval Street, Santa Fe, New Mexico 87504-2041 on the 29<sup>th</sup> day of March 2023 at 10:00 a.m.:

All documents, communications, and writing as described in Attachment "A" attached hereto and incorporated herein by this reference. See also Certificate of Authenticity for Completion.

CALL Jennifer Padgett Macias, Chief Deputy District Attorney, with the District Attorney's Office at (505) 827-5000.

IF YOU DO NOT COMPLY WITH THIS SUBPOENA you may be held in contempt of court and punished by fine or imprisonment.

March 13, 2023

/s/ Mary Carmack-Altwies  
Mary Carmack-Altwies  
District Attorney  
327 Sandoval St.  
Santa Fe, NM 87501  
505-827-5000

THIS SUBPOENA issued by or at request of:

/s/ Mary Carmack-Altwies  
Mary Carmack-Altwies  
District Attorney  
327 Sandoval St.  
Santa Fe, NM 87501  
505-827-5000

**AFFIDAVIT OF SERVICE BY ATTORNEY**

I declare and affirm that I caused a copy of this subpoena to be served Rust Movie Productions, LLC on this 13<sup>th</sup> the day of March 2023.

---

/s/ Mary Carmack-Altwies  
Mary Carmack-Altwies  
District Attorney  
327 Sandoval St.  
Santa Fe, NM 87501  
505-827-5000



## TO BE PRINTED ON EACH SUBPOENA

1. A command to produce evidence or to permit inspection may be joined with a command to appear for a deposition or trial.
2. A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.
3. If a person's attendance is commanded one full day's per diem must be tendered with the subpoena, unless the subpoena is issued on behalf of the state or an officer or agency thereof. Mileage must also be tendered at the time of service of the subpoena as provided by the Per Diem and Mileage Act. Payment of per diem and mileage for subpoenas issued by the state is made pursuant to regulations of the Administrative Office of the Courts.
4. To be completed only if the subpoena is commanding production of documents and things or inspection of premises before trial. If the subpoena is commanding production of documents and things or inspection of premises before trial, it must be served on each party in the manner provided by Rule 1-005. If service is by a party, an affidavit of service must be used instead of a certificate of service.

(Person Served: Corporation Service Company as Agent for Service of Process)

## PROTECTION OF PERSONS SUBJECT TO SUBPOENAS

A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

Subject to Subparagraph (2) of Paragraph D below, a person commanded to produce and permit inspection and copying may, within fourteen (14) days after service of the subpoena or before the time specified for compliance if such time is less than fourteen (14) days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to

produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it:

- (1) fails to allow reasonable time for compliance;
- (2) requires a person who is not a party or an officer of a party to travel to a place more than one hundred miles from the place where that person resides, is employed or regularly transacts business in person, except as provided below, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or
- (3) requires disclosure of privileged or other protected matter and no exception or waiver applies, or
- (4) subjects a person to undue burden.

If a subpoena:

- (1) requires disclosure of a trade secret or other confidential research, development, or commercial information, or
- (2) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or
- (3) requires a person who is not a party or an officer of a party to incur substantial expense to travel, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

#### DUTIES IN RESPONDING TO SUBPOENA

- (1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.
- (2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

STATE OF NEW MEXICO  
COUNTY OF SANTA FE  
FIRST JUDICIAL DISTRICT

STATE OF NEW MEXICO,

Plaintiff,

vs.

ALEXANDER RAE BALDWIN III,  
HANNAH GUTIERREZ

No. D-0101-CR-202300039  
D-0101-CR-202300040

Defendants

Judge Mary Marlowe Sommer

ATTACHMENT TO SUBPOENA

ATTACHMENT A

DEFINITIONS

As used herein, “YOU”, “YOUR”, “RESPONDING PARTY”, and or “DEPONENT” shall refer to the PERSON MOST KNOWLEDGEABLE (“PMK”) with regard to the production of documents by and from Rust Movie Productions, LLC.<sup>1</sup> (“Rust”) and anyone acting on behalf of Rust including but not limited to any of the directors, officers, managers, employees, agents, and or representatives of Rust.

---

1

Registered Agent Information

Name: CORPORATION SERVICE COMPANY

Physical Address: 110 E. Broadway St,  
Hobbs, NM 88240

As used herein, "DOCUMENTS" includes but is not limited to all "writings" as defined in N.M.R. Evid. 11-1101 et. seq. including but not limited to all letters, contracts, agreements, deal memoranda, memorandum of understanding(s) employment contracts, independent contractor agreements, memoranda, notes, authorization, court documents, and or messages as transmitted by electronic, written, graphic or otherwise recorded matter, however produced or reproduced and in any form and or format as designated in any fashion including but not limited to "Inbox", "Trash", "Sent Mail", "Screened Mail", "Personal Folders" and or "Popped Mail", in the actual or constructive possession or control of the Rust the officers, directors, managers, employees, agents, relatives to the third degree of consanguinity and or friends of Rust including the originals (or any copies when originals are not available) and any non-identical copies for the time of January 1, 2019 up to and including February 28, 2023 (the "time period" herein).

As used herein, "COMMUNICATIONS" refers to any written documents and or communications of any type, and by any medium, including but not limited to electronic from any source (e.g. e mail, personal digital assistant, cellular telephones, voice mail equipment, by and or from any and all software) which took place at any time from January 1, 2019 up to and including February 28, 2023 (the "time period" herein) regarding the written materials (DOCUMENTS or WRITINGS) identified hereinbelow.

When used with reference to DOCUMENTS or WRITINGS, "DESCRIBE" means to state the general character of the DOCUMENT (e.g. the letters, contracts, agreements, deal memoranda, memorandum of understanding(s) employment contracts, independent contractor agreements, memoranda, notes, authorization, note, message, etc.) with respect to the following individual and/or entity: Alexander Rae Baldwin III (a.k.a. Alec Baldwin); El Dorado Pictures, a California Corporation and or any agent, employee, director, officer, manager, representative and/or anyone acting on the behalf of Alexander Rae Baldwin III (a.k.a. Alec Baldwin); El Dorado Pictures, a California Corporation (collectively "BALDWIN" herein) and/or an identified individual and any document related to BALDWIN, as shown in any court document, letters, contracts, agreements, deal memoranda, memorandum of understanding(s) employment contracts, independent contractor agreements, memoranda, notes, authorization document, letter, e mail, memorandum, electronic text message, telephone memorandum, etc. the title thereof, the identity of the person who wrote, signed, initialed and or generated the DOCUMENT, the identity of the person to whom the DOCUMENT was addressed or for whom it was generated, the date and

substance of the DOCUMENT, whether it is still in existence, and to identify each person having custody of the DOCUMENT(s) or any copy thereof.

As used herein, "IDENTIFY" when used with reference to a PERSON, means to state the full legal name, telephone number, facsimile number, e-mail address, street address, including the city, state and zip code of the PERSON.

As used herein "IDENTIFY" when used with reference to DOCUMENTS means to state the general character of the WRITING AND/OR DOCUMENT (e.g., letters, contracts, agreements, deal memoranda, memorandum of understanding(s) employment contracts, independent contractor agreements, memoranda, notes, authorization, court document, e-mail, memorandum, attachment to an e-mail, etc.), any title, the identities of: the PERSON who authored the DOCUMENT, its intended recipient(s), the date and substance of the DOCUMENT, whether it is still in existence, and each PERSON having custody of the DOCUMENT(s) or copies thereof regarding BALDWIN for the time period.

Rust is to produce AND identify the following COMMUNICATIONS and DOCUMENTS and items pursuant to the subpoena as served upon Rust at this time:

1. All DOCUMENTS and COMMUNICATIONS, which refer and/or identify or make reference BALDWIN for the time period.
2. All DOCUMENTS and COMMUNICATIONS in any form and or with any content that identify, refer to or relate to BALDWIN in any manner, way, and or fashion whatsoever in which and or on which the name BALDWIN does appear for the time period.
3. All DOCUMENTS in YOUR possession regarding and or relating to any COMMUNICATIONS which identify or with regard to BALDWIN for the time period.

**From:** Kari Morrissey  
**To:** Wolberg, Abigail  
**Cc:** [harry.taub@icloud.com](mailto:harry.taub@icloud.com); [jpadgett@da.state.nm.us](mailto:jpadgett@da.state.nm.us); Jason J. Lewis; Marshall, Jessica  
**Subject:** RE: [EXT] Fwd: FW: State of New Mexico v. Baldwin and Gutierrez - D-0101-CR-202300039 and D-0101-CR-202300039  
**Date:** Wednesday, April 12, 2023 5:47:31 PM  
**Attachments:** [comp\\_#6253148-26a1-47a9-b861-6ac0ff0bc3c4.png](#)  
[image001.png](#)

---



At least make a partial disclosure please.

On 04/12/2023 4:22 PM MDT Wolberg, Abigail <[abigail.wolberg@lewisbrisbois.com](mailto:abigail.wolberg@lewisbrisbois.com)> wrote:

Respectfully Ms. Morissey, the subpoena did not only encompass items which have been previously disclosed in separate matters. For example, the subpoena seeks “all documents that reference BALDWIN”.

In any event, even in the midst of Ms. Perkins’ departure and my father’s very recent transfer to hospice care, we continue to take our disclosure responsibilities seriously and to work diligently to respond to the subpoena as quickly as possible.



**Abigail R. Wolberg** (She/Her/Hers)  
**Attorney**  
[Abigail.Wolberg@lewisbrisbois.com](mailto:Abigail.Wolberg@lewisbrisbois.com)  
**T: 505.300.5133 F: 505.828.3900**

8801 Horizon Blvd. NE, Suite 300, Albuquerque, NM 87113 | [LewisBrisbois.com](http://LewisBrisbois.com)

**Representing clients from coast to coast. View our locations nationwide.**

This e-mail may contain or attach privileged, confidential or protected information intended only for the use of the intended recipient. If you are not the intended recipient, any review or use of it is strictly prohibited. If you have received this e-mail in error, you are required to notify the sender, then delete this e-mail and any attachment from your computer and any of your electronic devices where the message is stored.

---

**From:** Kari Morrissey <[ktm@morrisseylewis.com](mailto:ktm@morrisseylewis.com)>  
**Sent:** Wednesday, April 12, 2023 3:58 PM  
**To:** Wolberg, Abigail <[Abigail.Wolberg@lewisbrisbois.com](mailto:Abigail.Wolberg@lewisbrisbois.com)>  
**Cc:** [harry.taub@icloud.com](mailto:harry.taub@icloud.com); [jpadgett@da.state.nm.us](mailto:jpadgett@da.state.nm.us); Jason J. Lewis <[jjl@jjllaw.com](mailto:jjl@jjllaw.com)>  
**Subject:** [EXT] Fwd: FW: State of New Mexico v. Baldwin and Gutierrez - D-0101-CR-202300039 and D-0101-CR-202300039

Ms. Wolberg

I am the new special prosecutor on this case. We will no agree to an extension of any kind. Our preliminary hearing is scheduled for May 3 - May 17 and we need time to prepare. Rust Productions has already provided all of this information to other lawyers involved in the civil suits related to this shooting. You should already have the stuff ready to go since you have given it to numerous other parties. Provide the documentation immediately.

Exhibit B

Kari Morrissey

----- Original Message -----

From: Jennifer Padgett Macias <JPadgett@da.state.nm.us>

To: Kari Morrissey <kim@morrisseylewis.com>, "jil@jillaw.com" <jil@jillaw.com>

Cc: "harry.faub@icloud.com" <harry.faub@icloud.com>

Date: 04/12/2023 1:06 PM MDT

Subject: FW: State of New Mexico v. Baldwin and Gutierrez - D-0101-CR-202300039 and D-0101-CR-202300039

Good afternoon,

Please see below regarding the subpoena for Rust Productions. Production was supposed to be today and an additional two weeks puts the release up against the preliminary hearing date.

Let me know if you will be responding.

Thanks,

Jennifer

---

**From:** Wolberg, Abigail <Abigail.Wolberg@lewisbrisbois.com>

**Sent:** Wednesday, April 12, 2023 12:48 PM

**To:** Jennifer Padgett Macias <JPadgett@da.state.nm.us>

**Cc:** Mary Carmack-Altwhies <MCarmack-Altwhies@da.state.nm.us>; Marshall, Jessica <jessica.Marshall@lewisbrisbois.com>; Fox (LA), Dana <Dana.Fox@lewisbrisbois.com>; harry.faub@icloud.com

**Subject:** RE: State of New Mexico v. Baldwin and Gutierrez - D-0101-CR-202300039 and D-0101-CR-202300039

**Importance:** High

Good morning counsel,

Mr. Perkins is no longer with our firm and I, myself, have been managing a health-related family emergency for a couple of weeks. Do you mind if we have an additional two weeks?

I apologize for the late notice and appreciate your patience.

Best,

Abby



**Abigail R. Wolberg** (She/Her/Hers)  
**Attorney**  
[Abigail.Wolberg@lewisbrisbois.com](mailto:Abigail.Wolberg@lewisbrisbois.com)  
**T: 505.300.5133 F: 505.828.3900**

8801 Horizon Blvd. NE, Suite 300, Albuquerque, NM 87113 | [LewisBrisbois.com](http://LewisBrisbois.com)

**Representing clients from coast to coast. View our locations nationwide.**

This e-mail may contain or attach privileged, confidential or protected information intended only for the use of the intended recipient. If you are not the intended recipient, any review or use of it is strictly prohibited. If you have received this e-mail in error, you are requested to notify the sender, then delete this e-mail and any attachments from your computer and any of your electronic devices where the message is stored.

**From:** Jennifer Padgett Macias <[JPadgett@da.state.nm.us](mailto:JPadgett@da.state.nm.us)>  
**Sent:** Tuesday, March 21, 2023 11:42 AM  
**To:** Perkins, Elizabeth <[Elizabeth.Perkins@lewisbrisbois.com](mailto:Elizabeth.Perkins@lewisbrisbois.com)>  
**Cc:** Mary Carmack-Altewies <[MCarmack-Altewies@da.state.nm.us](mailto:MCarmack-Altewies@da.state.nm.us)>; Marshall, Jessica <[Jessica.Marshall@lewisbrisbois.com](mailto:Jessica.Marshall@lewisbrisbois.com)>; Wolberg, Abigail <[Abigail.Wolberg@lewisbrisbois.com](mailto:Abigail.Wolberg@lewisbrisbois.com)>; Fox (LA), Dana <[Dana.Fox@lewisbrisbois.com](mailto:Dana.Fox@lewisbrisbois.com)>; [harry.taub@icloud.com](mailto:harry.taub@icloud.com)  
**Subject:** [EXT] RE: State of New Mexico v. Baldwin and Gutierrez - D-0101-CR-202300039 and D-0101-CR-202300039

Good morning Ms. Perkins,

Thank you for your email acknowledging service. A two week extension until April 12, 2023 is acceptable.

Thanks again,

Jennifer Padgett Macias

---

**From:** Perkins, Elizabeth <[Elizabeth.Perkins@lewisbrisbois.com](mailto:Elizabeth.Perkins@lewisbrisbois.com)>  
**Sent:** Tuesday, March 21, 2023 11:03 AM  
**To:** Jennifer Padgett Macias <[JPadgett@da.state.nm.us](mailto:JPadgett@da.state.nm.us)>  
**Cc:** Mary Carmack-Altewies <[MCarmack-Altewies@da.state.nm.us](mailto:MCarmack-Altewies@da.state.nm.us)>; Marshall, Jessica <[Jessica.Marshall@lewisbrisbois.com](mailto:Jessica.Marshall@lewisbrisbois.com)>; Wolberg, Abigail <[Abigail.Wolberg@lewisbrisbois.com](mailto:Abigail.Wolberg@lewisbrisbois.com)>; Fox (LA), Dana <[Dana.Fox@lewisbrisbois.com](mailto:Dana.Fox@lewisbrisbois.com)>  
**Subject:** State of New Mexico v. Baldwin and Gutierrez - D-0101-CR-202300039 and D-0101-CR-202300039

Good morning counsel,

We are in receipt of the subpoena served on Rust in the above matters and will be assisting Rust Movie Productions LLC in responding. Due to the volume of files that needs to be reviewed to respond, we request a two week extension making the response due April 12, 2023. Please let us know if this is acceptable. Thank you.





**Elizabeth G. Perkins**  
**Attorney**  
[Elizabeth.Perkins@lewisbrisbois.com](mailto:Elizabeth.Perkins@lewisbrisbois.com)  
**T: 505.300.5131 F: 505.928.3900**

8801 Horizon Blvd. NE, Suite 300, Albuquerque, NM 87113 | [LewisBrisbois.com](http://LewisBrisbois.com)

**Representing clients from coast to coast. View our locations nationwide.**

*This e-mail may contain or attach privileged, confidential or protected information intended only for the use of the intended recipient. If you are not the intended recipient, any review or use of it is strictly prohibited. If you have received this e-mail in error, you are requested to notify the sender, then delete this email and any attachments from your computer and any of your electronic devices where the message is stored.*