

STATE OF NEW MEXICO  
COUNTY OF SANTA FE  
FIRST JUDICIAL DISTRICT

FILED 1st JUDICIAL DISTRICT COURT  
Santa Fe County  
3/2/2023 3:16 PM  
KATHLEEN VIGIL CLERK OF THE COURT  
Monica Chavez Crespín

STATE OF NEW MEXICO  
Plaintiff,

v.

Case.: D-101-CR-2023-00041

DAVID HALLS,  
Defendant.

**UNOPPOSED**  
**MOTION TO CONTINUE IN PERSON PLEA HEARING**

COMES NOW, the defendant by and through David Halls, and hereby moves this Court to vacate and reset the in person Plea Hearing currently scheduled for March 8, 2023.

For Cause:

1. This matter is currently scheduled for an in person Plea Hearing on March 8, 2023 before the Honorable Mary Marlowe Sommer.
2. Undersigned filed a Notice of Non-Availability on January 31, 2023 noting undersigned's unavailability due to a jury trial for *State of New Mexico v Vicente Atencio* which was scheduled for February 27, 2023 through March 1, 2023 before the Honorable Brett Loveless.
3. Since the January 31, 2023 Notice of Non-Availability, the trial before the Honorable Brett Loveless for *State of New Mexico v Vicente Atencio*, was rescheduled for March 7, 2023 through March 9, 2023.
4. Therefore, undersigned is not available on March 8, 2023 for the in person Plea Hearing in this matter and further moves this Court to vacate and reset the Plea Hearing to a later date.

5. Undersigned will file a Notice of Non-Availability contemporaneously to this motion.
6. Undersigned contacted the State by and through Ms. Carmack-Altwies and Ms. Padgett Macias regarding the State's position on this motion and the State does not oppose.

WHEREFORE, undersigned moves this Court to vacate and reset the March 8, 2023 in person Plea Hearing to a later date for any other relief this Court deems proper and just.

Respectfully submitted,

/s/ Lisa Torraco

Lisa Torraco

Attorney for David Halls

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### **Certificate of Service**

I hereby certify that a true and correct copy of the foregoing pleading was delivered to the prosecuting attorney and co-defendant counsel via Tyler Host Odyssey e-filing system on the 2nd day of March, 2023.

/s/ Lisa Torraco