

STATE OF NEW MEXICO  
COUNTY OF SANTA FE  
FIRST JUDICIAL DISTRICT

STATE OF NEW MEXICO,

Plaintiff,

vs.

ALEXANDER RAE BALDWIN III  
HANNAH GUTIERREZ

Defendants

D-0101-CR-202300039  
D-0101-CR-202300040  
Judge Mary Marlowe Sommer

**STIPULATED MOTION FOR ENLARGEMENT OF TIME**

COMES NOW THE STATE OF NEW MEXICO, by and through, Mary Carmack-Altwhies, District Attorney and hereby moves for an enlargement of time pursuant to NMRA 5-302 (A)(1).

As grounds for this Motion, the State alleges:

1. Criminal Information(s) were filed with this Court on January 31, 2023 with regard to Defendants Alexander Rae Baldwin III and Hannah Gutierrez (collectively the “Defendants” herein.) The Amended Criminal Information(s) were filed with this Court on February 17, 2023. Defendant Baldwin waived the first appearance on February 23, 2023 and entered a plea of not guilty. Defendant Gutierrez made a first appearance on February 24, 2023 and entered a plea of not guilty.
2. Additional time is needed to accommodate the schedules of the court and the parties, and to secure the appearance of witnesses, many of whom may be out-of-state.
3. The Motion for Enlargement is authorized pursuant to NMRA 5-302 (A) (2) which provides in pertinent part that “upon a showing of good cause the court may extend the time limits for holding a preliminary hearing for up to sixty (60) days...”
4. The State respectfully requests a period of enlargement to May 3, 2023 which enlargement time should be sufficient time to allow the State to complete preparations for a preliminary hearing.
5. At the Status Conference held on March 9, 2023, Counsel for Defendants stipulated to this extension of time.

WHEREFORE, for the above stated grounds the State respectfully requests that the court grant an enlargement of time to May 3, 2023 at which time the Preliminary Hearing shall take place before this Court.

Respectfully Submitted,

*s/s Mary Carmack Altwies*  
Mary Carmack Altwies  
District Attorney  
First Judicial District Attorney's Office  
327 Sandoval St.  
Santa Fe, NM 87504  
(505) 827-5000

SO STIPULATED:

*s/s Robert Jason Bowles*  
Robert Jason Bowles  
4811 Hardware Drive N.E., Building D, Suite 5  
Albuquerque, New Mexico 87109  
Attorney for Defendant Hannah Gutierrez

*s/s Heather LeBlanc*  
Heather LeBlanc  
823 Gold Avenue SW  
Albuquerque, New Mexico 87102  
Attorney for Defendant Alexander Rae Baldwin III

### **CERTIFICATE OF DELIVERY**

I hereby certify that I caused to be delivered and served a true and correct copy of the foregoing pleading to all parties/counsel by and through the Odyssey electronic services of on this 10th day of March, 2023.

*/s/ Mary Carmack-Altwies*  
Mary Carmack-Altwies  
District Attorney

