

STATE OF NEW MEXICO
Plaintiff,

v.

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

DAVID HALLS,
Defendant.

MOTION TO CONTINUE PLEA HEARING

COMES NOW, the defendant, by and through Attorney Lisa Torrraco, and hereby moves this Court to vacate and reset the Plea Hearing currently scheduled for March 29, 2023.

For Cause:

1. This matter is currently scheduled for a Plea Hearing on March 29, 2023 before the Honorable Mary Marlowe Sommer.
2. Undersigned has a last minute scheduling conflict and is not available on March 29, 2023 due to a Jury Trial for *State of New Mexico v. Vicente Atencio*, D-202-CR-2021-01679. The trial begins on March 27th and is expected to take 3 days.
3. Therefore, undersigned is not available on March 29, 2023.
4. 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 takes no position, but requests a speedy reset. Due to the State's desire for a speedy reset, undersigned can make herself available all day on March 31, 2023 with the exception of between 11am-12pm. Undersigned begins another trial on April 3, 2023 which is expected to last 7 days.

WHEREFORE, the defense moves this Court to vacate and reset the March 29, 2023
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 23rd day of March, 2023.

/s/ Lisa Torraco

Lisa Torraco, Attorney for David Halls