

**STATE OF NEW MEXICO  
COUNTY OF SANTA FE  
FIRST JUDICIAL DISTRICT**

**STATE OF NEW MEXICO  
Plaintiff,**

v.

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

**DAVID HALLS,  
Defendant.**

**UNOPPOSED**  
**MOTION TO ALLOW VIRTUAL APPEARANCE AT PLEA HEARING**

COMES NOW, the defendant by and through, Lisa Torracco, attorney for David Halls and hereby moves this Court to allow virtual appearance at the Plea Hearing.

For Cause:

1. Defense moves this Court to allow Mr. Halls to appear virtually at the Plea Hearing in this matter.
2. Mr. Halls currently resides out of State and traveling to New Mexico is a financial hardship.
3. In addition, due to the intensive public interest, unwanted attention and potential safety concerns, the defense moves this Court to allow Mr. Halls' virtual appearance at the Plea Hearing.
4. Therefore, undersigned is requesting this Honorable Court allow Mr. Halls and his attorney to appear remotely.
5. 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 allow Mr. Halls' and his attorney to appear virtually at the Plea Hearing as not only is traveling to New Mexico a financial hardship, but also respectfully wishes to avoid unnecessary attention and harassment from the media and public, 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 3rd day of March, 2023.

/s/ Lisa Torraco