

STATE OF NEW MEXICO
COUNTY OF SANTA FE
FIRST JUDICIAL DISTRICT

STATE OF NEW MEXICO,

Plaintiff,

vs.

HANNAH GUTIERREZ

No. D-0101-CR-202300040

Defendant.

Judge Mary Marlowe Sommer

**ATTORNEY'S AFFIDAVIT IN SUPPORT OF UNOPPOSED PETITION
FOR OUT-OF-STATE SUBPOENA FOR CONVENING AND TAKING OF
PRE-TRIAL INTERVIEW**

I, Kari T. Morrissey, Special Prosecutor, being duly sworn, deposes and says:

1. I am an attorney duly licensed to practice law before all Courts in the State of New Mexico.
2. I am an appointed Special Prosecutor in the above entitled matter.
3. I am an attorney for the above-named Plaintiff.
4. I made this Affidavit in support of the Unopposed Petition for Out-of-State Subpoena for Taking Convening and Taking of the pre-trial interview of David John Halls aka David Halls ("Halls" herein) in regard to the above-entitled matter. Halls, as set forth below, resides in the State of Minnesota.
5. A detailed investigation and due diligence reveal that Halls resides at 11100 Anderson Lakes Parkway, Apt, 114, Eden Prairie, Minnesota 55344-4159 (Hennepin County, State of Minnesota).

6. Halls' pre-trial interview will be scheduled to be convened and taken by virtual (remote-Zoom) process which process will be initiated in this judicial district. Plaintiff will be able to present the testimony of Halls concerning key elements of this criminal prosecution.
7. I have contacted the attorney(s) representing Halls in the criminal matter Case No. D-101-CR-202300041 (Attorney Lisa A, Torraco) in order to secure the voluntary attendance of Halls for the pre-trial interview of Halls. Attorney Torraco has stated that Halls will not cooperate as to the voluntary attendance of Halls at the pre-trial interview.
8. WHEREFORE, your affiant respect prays that process be issued and the Unopposed Petition for Out-of-State Subpoena for the Convening and Taking of the pre-trial interview of Halls be granted. No previous application has been made to this or any other Court in regard to Halls' attendance at a pre-trial interview.

Dated: October 16, 2023

/s/ Kari T. Morrissey

Kari T. Morrissey, Special Prosecutor
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