

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

STATE OF NEW MEXICO,

Plaintiff,

v.

D-101-CR-2023-00040

HANNAH GUTIERREZ-REED,

Defendant.

**EMERGENCY EX-PARTE MOTION TO SEAL THE STATE OF NEW MEXICO'S
RESPONSE TO DEFENDANT'S MOTION TO SEVER**

Defendant Hannah Gutierrez-Reed, by and through her counsel of record, Jason Bowles of Bowles Law Firm, and Todd J. Bullion of Bullion Law Office, respectfully moves this Court to seal the Government's response to the Defendant's motion to sever filed on January 31, 2024. Counsel for the state has been contacted for their position on a motion to seal and has not responded. Due to the urgency of the situation and imminent risk of prejudice to the jury pool who will hear this case Defendant files this emergency ex-parte motion for relief:

The government's response contains blatant falsehoods built on inadmissible and highly prejudicial speculation. The whole point of moving to sever the charges and exclude the other acts evidence was to avoid the jury being exposed to inadmissible highly prejudicial material. Even if the motion to sever was denied there is no way the arguments counsel makes in their motion could have ever been properly presented to a jury.

The last pleading filed by the government in another case against Ms. Gutierrez Reed on January 31, 2024 in D-101-CR-2023-00418, was reported on in national news media including

ABC on the same day it was filed¹. It is foreseeable that this prejudicial information will be published and will expose the jury pool to highly prejudicial, false, statements of Ms. Morrissey.

Respectfully submitted,

/s/ Jason Bowles

Jason Bowles

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was sent through the ESF system, which caused the following parties to be served by electronic means, as reflected on the Notice of Electronic Filing this 1st day of February, 2024, to the counsel listed below:

Kari Morrissey
Special Prosecutor

/s/ Todd J. Bullion

Todd J. Bullion

Law Office of Todd J. Bullion

¹ See https://m.youtube.com/watch?si=CgeoBwYSw-k0qyaV&v=bTGni1mU_PI&feature=youtu.be