

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.

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**DEFENDANT'S UNOPPOSED MOTION FOR INDIVIDUAL VOIR DIRE**

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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, hereby moves this Court for Individual Voir Dire, and in support of her motion states as follows:

1. As this Court is aware, this case has generated intense publicity over the past year and a half.
2. There have been numerous statements made in the press regarding Ms. Gutierrez Reed.
3. The likelihood is that some or most jurors will have heard or read something in the press.
4. Defense counsel are requesting this Court allow a general question regarding anyone hearing or reading about this case or Ms. Gutierrez Reed in the press and a show of hands.
5. To not taint the panel, counsel are requesting and asking the Court a procedure whereby individual jurors can be questioned about this, perhaps at the end of the other questions on what they have heard and whether they can be fair and impartial.

6. In order to not slow down the voir dire in the beginning, perhaps this could be done at the very end of the questioning.

7. What counsel are trying to avoid is the panel being prejudiced by jurors saying what they have heard in front of other panel members.

8. This is important to ensure a fair and impartial jury for Ms. Gutierrez Reed.

9. Counsel for the state does not oppose this motion.

Respectfully submitted,

/s/ 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 8<sup>th</sup> day of January, 2024, to the counsel listed below:

Kari Morrisey  
Jason Lewis  
Special Prosecutors

/s/ Jason Bowles

Jason Bowles  
Bowles Law Firm