

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

STATE OF NEW MEXICO,

Plaintiff,

v.

D-101-CR-2024-00013

ALEXANDER RAE BALDWIN,

Defendant.

**UNOPPOSED MOTION TO EXTEND TIME FOR STATE'S RESPONSE TO  
DEFENDANT'S MOTION TO DISMISS AND FOR DEFENDANT'S REPLY**

COMES NOW, the State of New Mexico, by and through Kari T. Morrissey and Jason J. Lewis, Special Prosecutors for the First Judicial District Attorney, who respectfully request this Court extend the deadline for the State's response to the Defendant's Motion to Dismiss filed on March 14, 2024, and as grounds states as follows:

1. On March 14, 2024, the Defendant, through counsel, filed an extremely comprehensive Motion to Dismiss totaling fifty-nine pages along with hundreds of pages of exhibits.
2. On the same day, Hannah Gutierrez, the recently convicted Defendant in the companion case, filed an Emergency Motion for New Trial and for Immediate Release. There are currently two Special Prosecutors appointed to prosecute the cases involving Hannah Gutierrez and Alec Baldwin. Ms. Gutierrez has two attorneys defending her case and Mr. Baldwin has approximately six attorneys defending his case.
3. The State requires time to respond to both pleadings and is requesting the deadline for the State's response to the Defendant's Motion to Dismiss in the instant case be extended from March 29, 2024, to close of business on April 5, 2024.

4. The Defendant does not oppose this requested extension of time as long as the Defendant's time to file his reply is likewise extended through close of business on April 22, 2024.

WHEREFORE, for the foregoing reasons the State respectfully requests this Court extend the time for the State to respond to the Defendant's Motion to Dismiss filed on March 14, 2024, through close of business on April 5, 2024, and extend the time for the Defendant's reply through close of business on April 22, 2024.

Respectfully submitted,

/s/ Kari T. Morrissey  
Kari T. Morrissey  
Jason J. Lewis  
Special Prosecutors  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 20<sup>th</sup> day of March 2024, I served the forgoing pleading to all parties or counsel of record:

/s/ Kari T. Morrissey  
Kari T. Morrissey