

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

**STATE OF NEW MEXICO,
Plaintiff,**

No. D-101-CR-2024-00013

v.

**ALEXANDER RAE BALDWIN
Defendant.**

JOINT MOTION FOR ENTRY OF STIPULATED CONFIDENTIALITY ORDER

COMES NOW the State of New Mexico, by and through its attorneys of record, Jason J. Lewis and Kari T. Morrissey, and Defendant Alexander Rae Baldwin, by and through his attorneys of record, Luke Nikas, Alex Spiro, Michael Nosanchuk, Sara Clark and Heather M. LeBlanc, pursuant to 45 C.F.R. §§ 164.512(e)(1)(ii) and (v), and hereby move this Court to enter a Stipulated Confidentiality Order submitted with this Motion, and as grounds therefore, the parties state:

1. This litigation involves medical records which are of a sensitive, confidential, and legally protected nature.
2. Entry of the proposed Stipulated Confidentiality Order filed with this Motion is necessary in this action to protect privacy interests, to protect confidential information as identified in the Stipulated Confidentiality Order, and to limit disclosure and use of such confidential information to this criminal proceeding.

WHEREFORE, based upon the foregoing, the parties request that this Court enter the proposed Stipulated Confidentiality Order submitted with this Motion, and for such other and further relief as may be appropriate and just.

Respectfully submitted,

/s/ Jason J. Lewis

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I HEREBY CERTIFY that a true copy of the foregoing pleading was submitted for e-filing and service to all parties of record on this 27th day of March, 2024.

/s/ Jason J. Lewis

Jason J. Lewis