

**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
ORDER TO PRODUCE MEDICAL RECORDS**

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)(i) and (iv)(A), and hereby move this Court for entry of an Order requiring the production of medical records pertaining to Halyna Hutchins. As grounds for this motion, the parties state:

1. This litigation involves the medical records of Halyna Hutchins which are of a sensitive, confidential, and legally-protected nature.
2. The medical records are in the possession of the Santa Fe County Fire Department and TriState CareFlight. The records may be disclosed pursuant to a court order, as outlined in 45 C.F.R. §§ 164.512(e)(1)(i) and (iv)(A).
3. Entry of the proposed Stipulated Order filed with this motion is necessary to protect privacy interests, to protect confidential information as identified in the Stipulated Order, and to limit disclosure and use of such confidential information in this criminal proceeding.

4. Counsel for the State has notified counsel for Ms. Hutchins' estate of their intent to seek these records and they do not object.

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

Respectfully submitted,

/s/ Jason J. Lewis

Jason J. Lewis
Kari T. Morrissey
Special Prosecutors
1303 Rio Grande Blvd. NW, Ste. 5
Albuquerque, NM 87104
T: 505-361-2138
Special Prosecutors for the State of New Mexico

and

/s/ Sara Clark

QUINN EMANUEL URQUHART & SULLIVAN,
LLP
Sara Clark (admitted pro hac vice)
700 Louisiana St., Ste. 3900
Houston, TX 77002
saraclark@quinnemanuel.com

/s/ Heather M. LeBlanc

LEBLANC LAW, LLC
Heather M. LeBlanc
823 Gold Ave. SW
Albuquerque, NM 87102
Tel: 505-331-7222
heather@leblanclawnm.com
Attorneys for Defendant Baldwin

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