

STATE OF NEW MEXICO
COUNTY OF SANTA FE
FIRST JUDICIAL DISTRICT

STATE OF NEW MEXICO

Plaintiff,

v.

D-101-CR-2024-00013

ALEXANDER RAE BALDWIN,

Defendant.

**MOTION TO PERMIT DEFENDANT'S COUNSEL TO OBTAIN
RECORDING OF PROCEEDING**

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Counsel for Target

Alexander R. Baldwin III, by and through undersigned counsel, respectfully moves this Court to permit Mr. Baldwin's counsel to obtain a recorded copy of the hearing on the State's Expedited Motion to Preclude Target's Requested Evidence Before the Grand Jury, which was held on November 15, 2023. This matter was initially raised by defense counsel on November 16, 2023, to allow defense counsel to review the specific language of the Court's statements at the conference to evaluate and ensure compliance with the Court's instructions, statements, guidance and orders. As an indictment has since issued and this Court has been assigned the case, this motion is now properly before this Court.

Counsel for the State initially opposed the defense motion to obtain the recording. The indictment is now public. Undersigned counsel has sought the State's updated position, but has not received a response.

Date: March 6, 2024

Respectfully submitted,

QUINN EMANUEL URQUHART & SULLIVAN, LLP

By: /s/ Luke Nikas

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Counsel for Target

CERTIFICATE OF SERVICE

I hereby certify that on March 6, 2024, a true and correct copy of the foregoing notice was provided to opposing counsel via the Court's electronic filing system.

/s/ Heather M. LeBlanc
Heather M. LeBlanc