

STATE OF NEW MEXICO
COUNTY OF SANTA FE
FIRST JUDICIAL DISTRICT

STATE OF NEW MEXICO,

v.

D-101-CR-2024-13

ALEXANDER RAE BALDWIN,
Defendant.

FIRST AMENDED DEFENDANT'S WITNESS AND EXPERT WITNESS LIST

Defendant Alexander Rae Baldwin, by and through his counsel of record, Luke Nikas and Alex Spiro of Quinn Emanuel Urquhart & Sullivan, LLP, hereby submits his list of witnesses he may call at trial:

1. David Halls, c/o Lisa Torracco
Email: lisatorracco@gmail.com
Telephone: 505-244-0530
2. Dr. Bianca Alvarez
2211 Lomas Blvd
Albuquerque, NM 87106
3. Christina Espinoza
c/ o Jennifer Olson, Esq.
New Mexico Environmental Department
Post Office Box 5469
4. Robert Shilling
327 Sandoval St. Santa Fe, NM 87501
5. S.A. Jose Cortez
jacortez@fbi.gov
6. Deputy Sheriff Steven Orr
35 Camino Justicia, Santa Fe, NM 87508
7. Det. Joel Cano
35 Camino Justicia, Santa Fe, NM 87508
8. Det. Roy Arndt-Trujillo

- 35 Camino Justicia, Santa Fe, NM 87508
9. Lt. Michael Martinez
35 Camino Justicia, Santa Fe, NM 87508
 10. Sgt. Christopher Zook
35 Camino Justicia, Santa Fe, NM 87508
 11. Cpl. Oliver MacCartney
35 Camino Justicia, Santa Fe, NM 87508
 12. Cpl. Ernest Alderete
35 Camino Justicia, Santa Fe, NM 87508
 13. Major Gabriel Gonzales
35 Camino Justicia, Santa Fe, NM 87508
 14. Undersheriff Ken Johnson
35 Camino Justicia, Santa Fe, NM 87508
 15. Sheriff Adan Mendoza
35 Camino Justicia, Santa Fe, NM 87508
 16. Hannah Gutierrez
c/o Bowles Law Firm
4811 Hardware Dr., N.E., Bldg. D, Suite 5
Albuquerque, NM 87192
 17. John Ziello
15366 Atkinsons Ave.
Gardena, CA 90249
 18. Karen Keuhn
6 Frontier Court
Peralta, New Mexico 87042
 19. Catherine Walters
c/o David Foster
210 Montezuma Avenue, Suite 200
Santa Fe, New Mexico 87501

The defense reserves the right to call any witness listed on any State's witness list, any witness called by the state, any rebuttal witness, and any witness needed for authentication or chain of custody, and further reserves the right to supplement or amend this list.

Respectfully submitted,

QUINN, EMANUEL, URQUHART & SULLIVAN

By: /s/ Luke Nikas

Luke Nikas (*admitted pro hac vice*)

Alex Spiro (*admitted pro hac vice*)

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LEBLANC LAW, LLC

By: /s/ Heather M. LeBlanc

Heather M. LeBlanc

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Albuquerque, NM 87102

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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on April 19, 2024, I electronically filed the foregoing with the Clerk of the Court using the Court's electronic filing system, which caused all participants and counsel of record to be served, as more fully reflected on the Notice of Electronic Filing.

/s/ Heather M LeBlanc
Heather M. LeBlanc
Counsel for Defendant