

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

STATE OF NEW MEXICO,

Plaintiff,

vs.

D-101-CR-202400013

ALEXANDER RAE BALDWIN,

Defendant.

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**REPLY TO MOTION TO QUASH SUBPOENA TO MELINDA ZAMORA**

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Jason Bowles of Bowles Law Firm, hereby replies to the motion to quash a Subpoena Duces Tecum served upon Melinda Zamora by the State of New Mexico, and in further support states as follows:

Counsel agrees with the legal precedents and standards set forth in the State's Response. Counsel has already sent over to the State the two emails that Ms. Zamora typed contemporaneously with Mr. Baldwin's phone calls to the undersigned's law office. Ms. Zamora sent those two emails to undersigned counsel, and now they are also in possession of the State.

As respects Baldwin's calls to the undersigned's legal office therefore, counsel has already provided to the State the substance of those calls as recorded contemporaneously in email by Ms. Zamora. The undersigned and his office have no more written information on these calls to provide. Without waiving objections under the common interest/joint defense privilege, counsel has provided the state with all the emails Ms. Zamora sent reflecting calls by Mr. Baldwin to the undersigned's law office, to resolve this issue.

Respectfully submitted,

/s/ Jason Bowles

Jason Bowles

Bowles Law Firm

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing pleading was sent through the ESF system, which caused the following parties to be served by electronic means, as reflected on the Notice of Electronic Filing this 20<sup>th</sup> day of May, 2024, to the parties listed in the filing system.

/s/ Jason Bowles

Jason Bowles

Bowles Law Firm