

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

STATE OF NEW MEXICO,
Plaintiff,

v.

D-101-CR-2024-00013

ALEXANDER BALDWIN,
Defendant.

UNOPPOSED MOTION TO EXCEED PAGE LIMIT

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Counsel for Defendant Alec Baldwin

Alexander R. Baldwin III, by and through his counsel, hereby moves this honorable Court to permit undersigned counsel to exceed page limits under LR1-305(A) NMRA and states in support:

1. Mr. Baldwin intends to file a motion to dismiss the indictment based on the State's destruction of evidence, which is 28 pages long.

2. Mr. Baldwin also intends to file a motion to dismiss based on the State's failure to allege a crime, which is 16 pages long.

3. The State has been contacted about this Motion to Exceed Page Limit and indicated that the State would not oppose this as long as the defense included in its motion a request that the State be permitted to submit responses up to 25 pages long to each of the motions referenced in paragraphs 1 and 2 of this motion.

WHEREFORE, Defendant Alexander R. Baldwin III respectfully requests that this Court enter an order permitting the Defense and the State to exceed the page limits as outlined above.

Date: May 6, 2024

Respectfully submitted,

QUINN EMANUEL URQUHART & SULLIVAN, LLP

By: /s/ Luke Nikas

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CERTIFICATE OF SERVICE

I hereby certify that on May 6, 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
Counsel for Defendant