

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

STATE OF NEW MEXICO,

Plaintiff,

v.

No. D-101-CR-2024-00013
Judge Mary Marlowe Sommer

ALEXANDER RAE BALDWIN,

Defendant.

**DEFENDANT ALEC BALDWIN'S NOTICE OF WITHDRAWAL OF
WITNESSES FROM DEFENDANT'S WITNESS LIST**

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Defendant Alexander R. Baldwin III, by and through undersigned counsel, respectfully notifies this Court of Defendant's Withdrawal of Witnesses from Defendant's Second Amended Witness List, filed May 6, 2024.

While the Defense maintains the State's Motion to Exclude Defense Witnesses (filed May 6, 2024) is ill-founded and contrary to both the law and this Court's order, the Defense will consent to the relief sought by State's motion as to five of the nine witnesses the State seeks to exclude: Brian Bolman, Doran Curtin, Zachariah Sneesby, Jonathan Jaramillo, and Elizabeth Small.

The Defense further notifies the Court that it will eliminate a further six witnesses previously disclosed—John Ziello, Jose Cortez, Steven Orr, Oliver McCartney, Ken Johnson, and Gabriel Gonzales. The Defense witness list now lists a total of 15 witnesses, as reflected in the concurrently filed Third Amended Defendant's Witness List.

Of the four witnesses remaining that are the subject of the State's motion, the Defense stands on its argument, and notes there can be no genuine assertion of prejudice to the State from their timely inclusion. The State has been aware of two of the witnesses, had access to these witnesses since the day of the incident, and their PTIs are complete. Another individual was previously listed as a State witness in the *State v. Hannah Gutierrez* matter, and the State previously conducted a PTI of him, and thus has clearly had ample access. The fourth witness is a records custodian who has already provided an affidavit (which has been provided to the state), and who is not expected to testify beyond the scope of that affidavit. None of the identified witnesses are tendered as experts, and the Defense has no unproduced statements from any of the listed witnesses.

Date: June 2, 2024

Respectfully submitted,

QUINN EMANUEL URQUHART & SULLIVAN, LLP

By: /s/ Luke Nikas

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CERTIFICATE OF SERVICE

I hereby certify that on June 2, 2024, a true and correct copy of the foregoing filed through the New Mexico Odyssey File & Serve system, which caused all counsel of record to be served by electronic means.

/s/ Heather M. LeBlanc
Heather M. LeBlanc