

DISTRICT COURT, LA PLATA COUNTY, COLORADO 1060 East Second Avenue Durango, Colorado 81301		DATE FILED: September 17, 2018 10:27 AM FILING ID: A3013BC1DCE3C CASE NUMBER: 2017CR343
THE PEOPLE OF THE STATE OF COLORADO, Plaintiff,		
v.		
<b>MARK REDWINE,</b> Defendant		σ COURT USE ONLY σ
Douglas K. Wilson, Colorado State Public Defender John Moran, Attorney No. 36019 Justin Bogan, Attorney No. 33827 Deputy Public Defender 175 Mercado Street, Suite 250, Durango, CO 81301 Phone: (970) 247-9284 Fax: (970) 259-6497 E-Mail: Justin.Bogan@coloradodefenders.us Email: John.Moran@coloradodefenders.us		Case Number: 17CR343  Division: 1
<b>[D16]</b>		
<b>MOTION TO EXTEND MOTION FILING DEADLINE</b>		

Mr. Redwine, through counsel, moves this Court for an extension of the deadline to file motions in this case. AS GROUNDS, Mr. Redwine asserts the following:

1. Mr. Redwine is currently charged with Second Degree Murder F2, Child Abuse Knowingly/Recklessly Causing Death F2.
2. The investigation into the death of his son began in November of 2012. Undersigned defense counsel entered appearance on August 15, 2017. Representatives of the following non-exhaustive list agencies have participated or continue to participate in the investigation and generation of discovery materials:
  - a. La Plata County Sheriff's Office
  - b. The Federal Bureau of Investigations
  - c. Colorado Bureau of Investigation
  - d. Bayfield Marshall's Office
  - e. San Juan County New Mexico Sheriff's Office
  - f. Madison, Wisconsin Police Department
  - g. Durango Police Department
  - h. La Plata County Search and Rescue
  - i. New Mexico State Patrol
  - j. Colorado State Patrol
  - k. Utah State Patrol
  - l. Southern Ute Police Department

m. Homeland Security

n. The 20th, 6<sup>th</sup> and 1st Judicial District's District Attorney's Offices

3. There are almost 20,000 pages of discovery. Some 857 pages having been discovered in the last seven days. There are more than 350 discs of digital discovery with 11 having been discovered in the last approximately 30 days.
4. Counsel simply has not had a reasonable amount of time to process the continually growing amount of information the prosecution is generating.
5. Counsel is not in a position to assert to this Court that adequate time to prepare necessary motions has been available nor that all necessary motions will be prepared for the court on the currently set filing deadline of September 21, 2018.

Respectfully submitted this 16<sup>th</sup> day of September, 2018,

/s/ John Moran

John Moran, No. 36019  
Deputy State Public Defender  
Dated: September 17, 2018

/s/ Justin Bogan

Justin Bogan, No. 33827  
Deputy State Public Defender  
Dated: September 17, 2018

Certificate of Service  
I hereby certify that  
I served the foregoing  
document by e-filing same to all  
opposing counsel of record.  
/s/ John Moran  
/s/ Justin Bogan