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| DISTRICT COURT, EL PASO COUNTY, COLORADO 270 S. Tejon, Colorado Springs, CO 80903 | DATE FILED: Mar 15 2021 March 5, 2021 |
| PEOPLE OF THE STATE OF COLORADO, Plaintiff v. LETECIA STAUCH, Defendant | <input type="checkbox"/> COURT USE ONLY <input type="checkbox"/> Case Number: 2020CR1358 |
| El Paso County Sheriff's Office Office of the County Attorney Chris Strider (No. 51124) Assistant County Attorney 27 East Vermijo Ave. Colorado Springs, CO 80903 Phone: (719) 520-7264 | Div.: 15 |
| MOTION TO RECONSIDER THE COURT'S ORDER TO ALLOW DEFENDANT TO KEEP PAPER COPIES OF DISCOVERY IN HER CELL | |

The El Paso County Sheriff's Office (EPSO) by and through their undersigned counsel, hereby move this Court to reconsider the order to allow Defendant, Letecia Stauch, to keep paper discovery in her cell at the El Paso County Criminal Justice Center (CJC), and ask for an opportunity to be heard further on the issue. In support thereof, EPSO states the following:

1. Letecia Stauch is currently incarcerated in CJC pending trial in the above-captioned case. Ms. Stauch has decided to represent herself in the case.
2. On March 3, 2021, attorney Josh Tolini delivered between 1,400 and 1,800 paper pages of discovery to CJC to be provided to Ms. Stauch. The Court issued an order on March 4, 2021, appointing Mr. Tolini as advisory counsel for Ms. Stauch.
3. On March 5, 2021, the Court held a hearing in which EPSO expressed significant concerns over the safety and security of allowing Ms. Stauch to keep voluminous paper discovery materials in her cell. The District Attorney also stated that the total amount of discovery in the case was 26,101 pages at present count.
4. The Court issued an order that the case core of 1,400 to 1,800 pages was to be redacted by the District Attorney's Office and provided to Ms. Stauch in her cell for review.
5. EPSO maintains that providing excessive amounts of paper material to inmates at CJC presents significant concerns for the safety of the inmates, safety of staff, and security at

the facility. Allowing Ms. Stauch to keep this amount of paper material in her cell would be a significant departure from normal security policies and protocols at CJC.

6. Counsel for EPSO did not become aware that this specific issue would be addressed in the hearing on March 5 until the hearing had already commenced. EPSO did not have an opportunity to provide statements from officials at CJC addressing specific security concerns and to offer solutions that would address safety and security at CJC.

WHEREFORE, for the reasons set forth above, EPSO respectfully requests that the Court reconsider its order to allow Ms. Stauch to keep paper copies of discovery in her cell and to allow EPSO the opportunity to be fully heard on the matter.

DATED this 5th day of March, 2021

/s/ Christopher Strider
Christopher Strider #51124
Assistant County Attorney