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| District Court, La Plata County, ColoradoCourt Address:1060 E 2nd Ave , Durango, CO 813011-970-247-2304 | ▴ COURT USE ONLY ▴ |
| **PEOPLE OF THE STATE OF COLORADO,**Plaintiffv. **MARK REDWINE**,Defendant |
| Justin BoganJohn MoranDeputy State Public Defender175 Mercado St. #250 Durango, CO 81301Phone Number: 1-970-247-9284FAX Number: 1-970-259-6497Attorney Registration Number: 33829 and 36019 | Case Number: 17CR343 |
| Division 1 |
| **ENTRY OF APPEARANCE, NOTICE OF INTENT TO ADDRESS MONETARY CONDITIONS OF BOND, INVOCATION OF RIGHTS, AND DEMAND FOR PRESERVATION OF EVIDENCE, REQUEST FOR PRELIMINARY HEARING****[Public Access]** |

The Durango Regional Trial Office hereby enters its appearance on behalf of the above-named Defendant.

      1. Notice of Intent to Address Bond

Further, the Defendant, through counsel, herein provides notice to the District Attorney's Office, pursuant to § 16-4-109(2), C.R.S., of the Defendant's intention to address the issue of bond type **to specifically include monetary conditions.**

       2.  Invocation of Rights

Further, the Defendant asserts his right to counsel and to silence and to have counsel present during any line-ups or interrogation by police, agents, or prosecutors about this case or any other case. U. S. Const., Amend. V & VI; Colo. Const. Art. II, sec. 16 & 18. The Defendant hereby revokes and rescinds all purported releases, waivers and authorizations of any Constitutional and/or statutory rights and/or privileges.

       3.  Motion for Preservation of Evidence

Further, the Defendant moves this Court to order the prosecution, including law enforcement agencies involved in the investigation or prosecution of this case, to preserve for the inspection of defense counsel all physical evidence in this case, including all video footage, all audio recordings, all surveillance recordings, body fluids, any recordings of radio, telephone or other communications between law enforcement officers and any other person(s) pertaining to this case, including without limitation photographs, video media, "911" calls, and police dispatch tapes, and herein objects to the destruction, release, alteration, changing, testing, or modification of any evidence observed, collected and/or held in connection with this case by the District Attorney or law enforcement, or their agents.

Further, the Defendant requests that the prosecution immediately comply with all provisions of Crim. P. 16 and produce to the defense copies of all discovery materials within their possession or within the possession of law enforcement agencies that have participated in the case to include but not be limited to:  photographs, 9-1-1 tapes (including dispatch traffic), defendant’s and co-defendant’s statements, signed waivers, or releases.  The Defendant also requests an order be entered mandating discretionary expert discovery pursuant to Crim. P. 16(I)(d)(3).

Further, the Defendant requests that the prosecution provide to defense counsel all other evidence and information material to this case whether in its actual possession or in the possession of its agents or any other person who regularly reports to the prosecution or has reported to the prosecution with respect to this case; and, pursuant to Crim.P. 16(c)(1), all discoverable material and information in the possession of other governmental personnel. This request extends to exculpatory information, impeachment information, and all other information relevant to guilt or punishment. U.S. Const. amends. VI, XIV; Colo. Const. art. II,  section 16; *Brady v. Maryland,* 373 U.S. 83 (1963); *United States v. Bagley,*473 U.S. 667 (1985).

           4.   Request for Preliminary Hearing

Lastly, Defendant requests a Preliminary Hearing. *See* Crim. P. 5(a)(4).

DOUGLAS K. WILSON
COLORADO STATE PUBLIC DEFENDER
/s/John Moran
John Moran, 36019
Deputy State Public Defender

DOUGLAS K. WILSON
COLORADO STATE PUBLIC DEFENDER

**Certificate of Service**

I hereby certify that I served the foregoing document by e-filing with ICCES same to all opposing counsel of record.

 **/s/ John Moran\_**