| DISTRICT COURT, LA PLATA COUNTY,<br>COLORADO  |  |
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| 1060 East Second Avenue Durango, Colorado 81301   | DATE FILED: May 1, 2019 11:12 AM<br>FILING ID: A9631D97A6696<br>CASE NUMBER: 2017CR343 |
| THE PEOPLE OF THE STATE OF COLORADO, Plaintiff,   |  |
| v.  | ☐ COURT USE ONLY☐  |
| MARK REDWINE, Defendant   |  |
| Megan Ring, Colorado State Public Defender<br>John Moran, Attorney No. 36019<br>Justin Bogan, Attorney No. 33827  | Case Number: 17CR343   |
| 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 | Division: 1  |

[D-115]
NOTICE OF INTENT TO FILE VERIFIED MOTION FOR PRO HAC VICE ADMISSION OF
OUT OF STATE ATTORNEY DANA DELGER OF THE INNOCENCE PROJECT, INC OF
NEW YORK, NEW YORK

PUBLIC ACCESS

- This Notice is filed pursuant to CRCP 205.3 to provide notice to opposing counsel that local defense counsel in this matter, Justin Bogan, is filing a motion with The Colorado Supreme Court Office of Attorney Registration for the pro hac vice admission of Dana Delger.
- 2. Attorney Delger is a staff attorney at the Innocence Project in New York, New York.
- 3. Attorney Delger is a member in good standing of the Bar in the State of New York. She has also been licensed in the following jurisdictions: The United States District Court for the Southern District of New York, since 2012; The United States District Court for the Eastern District for New York, since 2012; and the United States Court of Appeals for the Second Circuit, since 2016.
- 4. Attorney Delger is seeking pro hac vice admission for the sole purpose of assisting in litigating the cadaver dog issues at the motions phase of this matter.

5. Mr. Redwine has consulted with his local counsel, and consistent with his 6<sup>th</sup> Amendment right in the United States Constitution to have the attorney of his choice, requests that Dana Delger be admitted in this matter pro hac vice.

Dated: May 1, 2019

/s/ <u>Justin Bogan</u> Justin Bogan, No. 33827 Deputy State Public Defender

Certificate of Service
I hereby certify that on May 1, 2019
I served the foregoing document by e-filing same to all opposing counsel of record.

/s/ Justin Bogan