

DISTRICT COURT, LA PLATA COUNTY, COLORADO 1060 East Second Avenue Durango, Colorado 81301	<p style="text-align: right;">FILED IN COMBINED COURT LA PLATA COUNTY, COLORADO JUN - 6 2019 DEPUTY CLERK</p> <p style="text-align: center;">σ COURT USE ONLY σ</p>
THE PEOPLE OF THE STATE OF COLORADO, Plaintiff, v. MARK REDWINE, Defendant	
Megan Ring, Colorado State Public Defender Justin Bogan, Attorney No. 33827 John Moran, Attorney No. 36019 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
<p>[D-125] RENEWED MOTION FOR REALISTIC, GOOD FAITH WITNESS LIST (PUBLIC ACCESS)</p>	

1. On September 20, 2018 Defense Counsel filed "D-35 MOTION FOR REALISTIC, GOOD FAITH WITNESS LIST".
2. On February 19, 2019 this Court filed "D-35 Order Regarding the Request for a Good Faith Witness List". In that order, the Court directs Defense and Prosecution provide a good faith witness list at least sixty days before trial. The Order further states that each party will have twenty-one days after both lists have been exchanged to supplement their good faith witness list.
3. To date, the Defense has endorsed two witnesses.
4. A recent review of endorsements filed by the Prosecution revealed four hundred and twenty-four witnesses. Ninety-seven witnesses were endorsed without any contact information.
5. Trial in this matter is scheduled from September 19, 2019 to October 18, 2019. This is twenty-one working days. The current witness list would require the Court to hear testimony from over 20 witnesses each day.

6. Defense Counsel has the obligation to effectively prepare to investigate all issues related to any witnesses who will be called at trial or any sentencing hearing, to prepare adequate examinations of such witnesses, to raise legal issues related to such witnesses, and continue to prepare the defense case in order to discharge their constitutional obligation to provide Mr. Redwine with the effective assistance of counsel. *See Strickland v. Washington*, 466 U.S. 668 (1984) U.S. Const. amends. VI, XIV; Colo. Const. art. II, secs. 16, 25. The witness list in its current form makes meeting this burden virtually impossible.

WHEREFORE, Mr. Redwine renews his request for an order directing both parties to file a good faith witness list by June 17, 2019. In the alternative, Mr. Redwine requests a hearing on this motion.

Dated: June 6, 2019

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

/s/ John Moran
John Moran, No. 36019
Deputy State Public Defender

Certificate of Service

I hereby certify that on June 6, 2019
I served the foregoing document by e-filing
same to all opposing counsel of record.

/s/ Justin Bogan /s/ John Moran