

FILED IN MY OFFICE THIS
MAR 15 2017 9:19am
J. Campbell
CLERK DISTRICT COURT

SECOND JUDICIAL DISTRICT COURT
STATE OF NEW MEXICO
COUNTY OF BERNALILLO

STATE OF NEW MEXICO,
Plaintiff,

vs.

No. D-202-CR-2016-00789

DARRIUS DAVON VALLES,

Defendant.

**DEFENDANT'S MOTION TO EXCLUDE TESTIMONY OF STATE'S
WITNESSES**

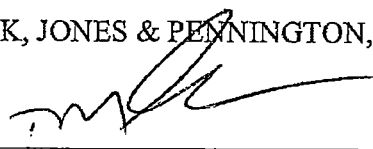
COMES NOW, the Defendant, Darrius Valles, by and through his undersigned counsel and pursuant to the United States Constitution and the Constitution of the State of New Mexico, moves this Court for an order to exclude the testimony of Julia Quaglia-Jaramillo and DeAmber Yonker in this case and in support of this Motion does state and allege as follows:

1. The State's witnesses, Julia Quaglia-Jaramillo and DeAmber Yonker have not been made available for interview by Defense counsel;
2. The deadline set by this Court to interview witnesses was February 3, 2017;
3. Defense counsel has not had the opportunity to interview these witnesses;
4. While suppression is a harsh remedy, it is appropriate in this case.

WHEREFORE, the Defense requests the Court suppress all statements and testimony of Julia Quaglia-Jaramillo and DeAmber Yonker.

Respectfully submitted,

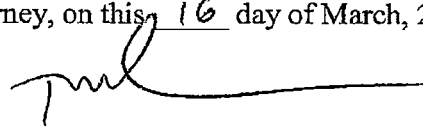
CLARK, JONES & PENNINGTON, LLC

By: 

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was delivered to Les Romaine of the Office of the District Attorney, on this 16 day of March, 2017



Thomas M. Clark