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| County Court, Gilpin County, Colorado Court address: 2960 Dory Hill RDBlack Hawk CO 80422 | DATE FILED: February 21, 2017 2:0FILING ID: 718C512A37FBB CASE NUMBER: 2016T169** COURT USE ONLY ** |
| **People of the State of Colorado v.****Defendant:** ROBERT FRIEDLANDER |
| Attorney for ROBERT FRIEDLANDERDaniel E. Luneau FIFE Luneau, PC1873 S Bellaire STE 200Denver CO 80222Phone Number: (303) 757-2200E-mail: dluneau@duidenver.comFAX Number: (303) 756-6160 Atty.Reg.: 43639 | Case Number: 16T169 |
| **MOTION FOR PRODUCTION OF WITNESSES PURSUANT TO § 16-9-203, COLORADO REVISED STATUTES 2016 - ALAN C. TRIGGS** |

Defendant, ROBERT FRIEDLANDER, by and through Counsel, DANIEL E. LUNEAU, submits his MOTION FOR PRODUCTION OF WITNESSES PURSUANT TO § 16- 9-203, COLORADO REVISED STATUTES 2016 – ALAN C. TRIGGS and as grounds

therefore would show the Court:

1. This Court is a court of record as that term is understood under the laws of the State of Colorado.
2. The State of Ohio is a state which, by its laws, "has made provision for commanding persons within its borders to attend and testify in criminal prosecutions or grand jury investigations commenced or about to commence in this state". *See*, § 16-9-203, COLORADO REVISED STATUTES 2016.
3. ALAN C. TRIGGS, whose mailing address is 2857 Perthwood Drive, Cincinnati, OH 45244, is a material witnesses to the acts which form the basis of the People's case herein, and, as such, is an essential defense witness.
4. ALAN C. TRIGGS, being a material witness to this case and essential to the defense of this defendant, certification is required pursuant to § 16-9-203, COLORADO REVISED STATUTES 2016, for the attendance of ALAN C. TRIGGS at the motions hearing herein on March 20, 2017. *See*, *People v. McCabe*, 37 Colo. App. 181, 546 P.2d 1289 (1975).1

WHEREFORE, Defendant prays this Honorable Court Certify ALAN C. TRIGGS as a material witness for the motions hearing in this action on March 20, 2017 and direct that said certification, under seal of Court, for presentation to the Ohio state courts.

Respectfully submitted:

/S/ DANIEL E. LUNEAU

DANIEL E. LUNEAU

Attorney for the Defendant

**CERTIFICATE OF SERVICE**

Signing counsel certifies that this document was served when filed by

designating it as a file and serve document in the electronic filing system **and by additional service upon** **attorney.general@state.co.us**.

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