

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF COCONINO

STATE OF ARIZONA,
Plaintiff,

vs.

ANN MARIE MARTINEZ
Defendant.

No. **CR 2020-00632**
CASE MANAGEMENT
CONFERENCE
JOINT STATEMENT
**MOTION TO CONTINUE/SET
HEARING**

CMC Date: January 25, 2021

REQUEST FOR APPEARANCE HEARING

Note: To request that the CMC be an appearance hearing, file this statement no less than 24 hours before the CMC date and email a courtesy copy to the judicial assistant and the jail if the Defendant is in custody.

1. Is any party requesting an appearance hearing? Yes No
2. Provide the basis for the requested hearing (e.g., missing disclosure, pending motions):
3. Does Defendant want their presence waived? Yes No

NON-APPEARANCE HEARING

Case Status

The parties hereby avow to the Court that the following activities have occurred in this case:

(Check all that apply)

- Defense counsel and Defendant have been in communication

- The State and Defense are in the process of complying with Rule 15.1, Ariz R.Crim.P. and are communicating to resolve any outstanding disclosure items.
- There are no disclosure or discovery disputes at this time between the parties that require the Court's involvement.
- There are no pending motions (including Notice of Change of Judge) before the Court.

For any item(s) not checked above, please explain why and the parties' plan for addressing these issues:

Have parties completed the tasks they were going to complete since the last CMC?
 Yes No

List completed tasks: This case was formerly CR 2020-00359. The defense is still actively pursuing investigation and obtaining records in defense of the allegations in this case. Over 2,000 pages of disclosure have been made in this case. Defense counsel has been in contact with potential defense witness, however, due to COVID-19 no in-person meetings or interviews have taken place. Defense anticipates filing a Motion for additional records and is in communication with the state regarding the Motion and the specific records. Both parties are awaiting the Court's ruling on the Motion to Remand filed by the Defense.

If tasks not completed, please state why not completed?

What *specifically* will be accomplished between now and the next CMC to move to resolution of this matter? Defense will continue to review the disclosure and prepare its case, which hopefully include in-person interviews once COVID-19 has subsided.

Plea Discussions

The status of plea negotiations is as follows (check applicable boxes):

- There is a written plea offer that expires _____. The plea offer has been communicated in writing to: defense attorney/ Defendant.
- A plea offer is forthcoming from the State/being discussed/or a deviation request is pending
- No plea offer will be made. (According to the State.)

A settlement conference is requested is scheduled for:
 has been held.

Hearing Dates

- Defendant will be advised of upcoming hearing dates.
 Victims' Rights have been complied with (as applicable).
 The parties request the Court set the following hearing(s)
 CMC Change of Plea Combined Change of Plea/Sentencing
 Trial scheduling hearing Other:

The parties request, as to scheduling, that the Court set the hearing(s):

- at the Court's earliest convenience
 in approximately 30-45 days
 off-calendar setting requested by:
 Defense State

The parties note that they are **unavailable** as follows:

Deputy County Attorney:

Defense Counsel:

Defendant agrees to waive Rule 8 time for the setting of
this next hearing.

Defendant does not agree to waive Rule 8 time for the setting of this next
hearing.

Prosecutor

Name: /s/ *Stacy Krueger*

Bar Number: 027020

Address: 110 E. Cherry Ave.
Flagstaff, AZ 86001

Email: skrueger@coconino.az.gov

Telephone: 928-679-8226

Defense Counsel or Self-Represented Defendant

Name: /s/ Gregory T. Parzych

/s/ Ryan Stevens

Bar Number: 014588 and 026378

Address: 2340 W. Ray Road, Suite 3
Chandler, AZ 85224

Email: gparzlaw@aol.com

Telephone: 480-831-0200

Date Submitted: January 22, 2021