

<p>DISTRICT COURT, COSTILLA COUNTY, STATE OF COLORADO</p> <p>Court Address: Costilla County Courthouse 304 Main Street, P.O San Luis, CO. 811520000</p>	<p style="text-align: center;">DATE FILED April 1, 2026 4:32 PM</p> <p style="text-align: center;">COURT USE ONLY</p>
<p>Plaintiff: THE PEOPLE OF THE STATE OF COLORADO</p> <p>v.</p> <p>Defendant: DANNY SANCHEZ</p>	
<p><i>Attorney for Defendant:</i></p> <p>Mallory A. Revel, Reg. #45662 Foster Graham Milstein & Calisher, LLP 360 S. Garfield Street, 6th Floor Denver, Colorado 80209 Phone: (303) 333-9810 Fax: (303) 333-9786 Email: mrevel@fostergraham.com</p>	<p>Case No.: 26CR503</p> <p>Division: WW</p> <p>Courtroom: WW</p>
<p>ENTRY OF APPEARANCE AND MOTION FOR DISCOVERY</p>	

COMES NOW the law firm of Foster Graham Milstein & Calisher, LLP, and hereby enters its appearance as counsel of record for Defendant Danny Sanchez in the above-referenced case.

Additionally, Mr. Sanchez, by and through his attorneys, also requests that this Honorable Court require disclosure by the Prosecution as soon as possible of the following categories of material or information and to require the Prosecution to obtain, preserve and disclose the same categories of material and information which may be in the possession or control of any other governmental personnel:

1. The names and addresses of all persons the Prosecution intends to call as witnesses, together with their relevant written or recorded statements and/or any relevant written or recorded statements of endorsed witnesses whose testimony will be introduced as hearsay.
2. The police, arrest, offense, and/or incident reports, including statements (whether oral or written) of all witnesses and Mr. Sanchez.
3. All reports by any law enforcement officials in relation to statements made by Mr. Sanchez.

4. Any reports or statements of experts made in connection with this particular case, including results of physical, medical or mental examinations and scientific tests, experiments or comparisons.

5. Any books, papers, documents, photographs, electronic recordings, computer files and disks, or tangible objects held as evidence in this case or otherwise relating to this case.

6. Any record of prior criminal convictions for Mr. Sanchez and/or any person the Prosecution intends to call as a witness in the case, including the alleged victim.

7. All tapes and transcripts of any electronic surveillance (including video surveillance) of conversations involving Mr. Sanchez or any witness in this case, and/or other tapes and transcripts.

8. Any and all audio or video recordings existing in relation to this matter, including body-camera audio/video, 911 tapes, audio/video recordings on the person of any involved law enforcement officer, any dash camera or other audio/video recordings from law enforcement vehicles involved in this matter, and any other audio/video recordings shared with law enforcement by any person in relation to this matter.

9. Records of prior calls for services to the involved location(s) or in relation to the parties and witnesses to the related events.

10. Cell phone ping or any cell phone, GPS, or other location data gathered in relation to the parties, witnesses, or events pertaining to this matter.

11. HALO video or other similar camera footage available in relation to the events involved in this matter.

12. Any information or media accessed or available through security systems such as FLOCK or related systems.

13. Disclosure of any related correspondence within any and all involved law enforcement or investigatory bodies including any task forces, including through CAD systems such as VERSADEx or related systems, and all related correspondence between those law enforcement bodies and the District Attorney pertaining to this matter.

14. All material or information in whatever form that tends to negate Mr. Sanchez's guilt as to the offense charged or would tend to reduce the punishment therefore.

WHEREFORE, Mr. Sanchez respectfully requests this Court to require the Prosecution to provide the foregoing requested documents as soon as possible.

Respectfully submitted this 1st day of April, 2026.

FOSTER, GRAHAM, MILSTEIN & CALISHER, LLP

By: /s/ Mallory Revel

Mallory A. Revel, Reg. #45662

ATTORNEY FOR MR. SANCHEZ

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of April, 2026, a true and correct copy of the foregoing **ENTRY OF APPEARANCE AND MOTION FOR DISCOVERY** was served via Denver County Court E-File to the following:

12th Judicial District Attorney's Office
601 Main Street
Alamosa, CO 81101

/s/ Melah Garwood

Melah Garwood