STATE OF INDIANA))SS: COUNTY OF CARROLL)) STATE OF INDIANA) v.) RICHARD ALLEN) IN THE CARROLL CIRCUIT COURT CAUSE NO. 08C01-2210-MR-000001

MOTION TO CONVERT LET BAIL HEARING INTO SUPPRESSION HEARING

Comes now the Accused, by counsel, and moves this Court to convert the hearing, that is currently scheduled for June 15, 2023, from a Let Bail Hearing into a Suppression Hearing. In support of this motion, the Accused states the following:

- That currently, this matter is set for a Let Bail Hearing on June 15, 2023.
- For a variety or reasons, counsel for the Accused requests that the Let Bail Hearing be converted to a Suppression Hearing.
- That the Accused files contemporaneously his Motion to Suppress Fruits of the Search of 1967 North Whiteman Drive, Delphi, Indiana.
- 4. That counsel for the Accused believes that a hearing on said motion should last no more than four (4) hours in terms of testimony and argument that the defense will be presenting.

WHEREFORE, the Accused requests this Court to convert the hearing currently scheduled for June 15, 2023 from a Let Bail Hearing to a Suppression Hearing.

Respectfully submitted,

<u>/s/ Andrew Baldwin</u> Andrew Baldwin, Atty. No.17851-41 Counsel for Defendant BALDWIN PERRY & WILEY, P.C. 150 N. Main St. Franklin, Indiana 46131 317-736-0053

CERTIFICATE OF SERVICE

This is to certify a copy of the foregoing pleading has been provided to all counsel of record for the opposing party, via IEFS this same day of filing.

<u>/s/ Andrew Baldwin</u> BALDWIN PERRY & WILEY, P.C.