

Dolores County Combined Courts, Colorado Court Address: 409 Main St. Dove Creek, CO 81324 970-677-2258	DATE FILED: March 2, 2022 12:50 PM
<b>PEOPLE OF THE STATE OF COLORADO,</b> Plaintiff v. RONALD MOROSKO, Defendant	▲ COURT USE ONLY ▲
Kenneth Pace PACE & LITTLE, LLC 679 E. 2 <sup>nd</sup> Ave. #3 Durango, CO 81301 Phone Number: 1-970-247-5282 E-mail address: kenneth.pace@durangoattorneys.com Attorney Registration Number: 41214	Case Number:  21CR11
<p style="text-align: center;"><b>MOTION TO PERMIT EXPERT WITNESSES TO TESTIFY VIA WEBEX FOR MOTIONS HEARING</b></p>	

Comes now, Ronald Morosko, through counsel and requests this allow his expert witnesses to testify via Webex the Motions Hearing. As grounds:

1. Mr. Morosko is currently set for a Motions Hearing on March 7<sup>th</sup>, 2022, at 9:00 am.
2. Defense counsel has hired multiple experts with pertinent information to offer this court. Specifically, the defense has retained a former police captain and hunting expert out of New York State, as well as a Trauma Expert out of Morrison, Colorado.
3. It is anticipated that these experts will be paid to travel to Colorado for the jury trial in this matter. However, it is prohibitively expensive to have them additionally travel to offer testimony at the Motions Hearing. The anticipated cost to the defense for each trip is upwards of \$7500.00, while Mr. Morosko is retired and lives off a pension as a career steel worker.
4. Both witnesses have the capability to use video conferencing (Webex) technology to offer testimony on the motions presently pending before the court.

WHEREFORE, Mr. Morosko respectfully requests this court allow his experts to testify via Webex for the Motions Hearing on March 7<sup>th</sup>.

Respectfully Submitted,

Pace & Little, LLC

/s/ Kent Pace  
Kenneth Pace #41214

**CERTIFICATE OF SERVICE**

I certify that on 3/2/22, I served the forgoing document through ICCES to all opposing counsel. /s/ Jennifer Stahl

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