

ANN M. TALIAFERRO (#8776)
Attorney for Defendant
BROWN, BRADSHAW & MOFFAT, L.L.P.
422 North 300 West
Salt Lake City, Utah 84103
Telephone: (801) 532-5297
Facsimile: (801) 532-5298

IN THE SALT LAKE CITY JUSTICE COURT
IN AND FOR SALT LAKE COUNTY, STATE OF UTAH

<p>SALT LAKE CITY,</p> <p>Plaintiff,</p> <p>v.</p> <p>██████████ ██████████</p> <p>Defendant.</p>	<p>MOTION TO RECALL WARRANT AND SET FOR PRETRIAL CONFERENCE</p> <p>Case No. ██████████</p>
---	---

The defendant, ██████████ ██████████ by his attorney, Ann Marie Taliaferro, hereby moves the Court for an order recalling the warrant which issued on December 28, 2016, in this case.

The grounds for this motion are:

1. Counsel was retained in this matter shortly after the date of the violation.

Counsel's office has been checking daily for filing.

2. An Arraignment hearing was apparently scheduled for December 27, 2016.
3. The Defendant's name in the caption of the case as filed, however, is incorrect.

The Defendant's name is ██████████ ██████████ not ██████████ ██████████

4. Accordingly, although counsel has been checking the status of filing regularly, due to the incorrect name appearing in the case caption, counsel was unaware that an arraignment had been scheduled. Thus, the Defendant also was not informed of the arraignment date.

5. Defendant desires to take care of this matter with this Court, and had no intention of missing a court date.

WHEREFORE, based on the foregoing, the defendant respectfully moves this Court to recall the warrant in this matter, and set the matter for a pretrial conference. January 2017.

/s/ Ann Marie Taliaferro
ANN MARIE TALIAFERRO
Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of January, 2017, a true and correct copy of the foregoing *Motion to Recall Warrant and Set for Pretrial Conference* was electronically filed with the Court using the e-filing system which sent notification of such filing to the following:

Salt Lake City Prosecutor
349 South 200 East, #500
Salt Lake City, Utah 84114

/s/ Ann Marie Taliaferro