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IN THE CIRCUIT COURT FOR THE STATE OF OREGON
FOR THE COUNTY OF LINN COUNTY

STATE OF OREGON,
Plaintiffs,

v.

KYLA MAZHARY-CLARK,
Defendants.

Case No. 23CR46313

NOTICE OF OBJECTION AND
REQUEST FOR HEARING

Counsel for defendant Kyla Mazhary-Clark hereby gives notice that defendant objects to the State’s requested modification of release conditions and requests a hearing on the motion as well as a status conference. The parties’ last status conference was setover at defendant’s request, but a new date not yet set.

Defense counsel requests additional time to investigate and prepare for the hearing on the State’s requested modifications of release conditions. The State’s requested modification essentially asks to remove the two minor children from Ms. Mazhary-Clark’s care. If the State’s request is granted and a no-contact order issued, the minor kids will almost certainly be taken into DHS custody because Ms. Mazhary-Clark currently has sole custody pursuant to Linn County Case No. 19DR03123. Additional time is required to adequately brief the issue for the court and potentially subpoena witnesses to testify. Additional time is also necessary to coordinate with Ms. Mahzary-Clark’s family law attorney, who will be providing critical information that the court should have before making its decision. Lastly, the parties need to set a status conference on this matter, since the last one was continued at the defendant’s request. The

1 defense requests that all of these matters be dealt with at a status conference, to give the parties
2 appropriate time to brief the issue and provide relevant documentation, and potentially prepare
3 witnesses to testify.

4 Defense counsel can be available for a hearing on the following days and times:

- 5 • January 3: anytime
- 6 • January 9: anytime (but only by phone or Webex in afternoon)
- 7 • January 10: anytime
- 8 • January 12: anytime
- 9 • January 16: anytime (but only by phone or Webex)
- 10 • January 17: anytime (but only by phone or Webex)
- 11 • January 22: anytime
- 12 • January 23: anytime

13 DATED this 12th day of December, 2023.

14
15 /s/Kristen L. Tranetzki
16 **ANGELI LAW GROUP LLC**
17 KRISTEN L. TRANETZKI, OSB#113750
18 AMANDA A. THIBEAULT, OSB#132913

19 *Attorneys for Defendant*
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I caused a true copy of the foregoing to be served on the Plaintiff, at
3 the following email address:

4 Jenna Wallace
5 Lincoln County DA’s Office
6 jwallace@co.lincoln.or.us

- _____ By hand delivery
- _____ By first-class mail*
- X By email
- _____ By overnight mail
- _____ By facsimile transmission
- _____ Fax #:
- _____ Ph #:

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9
10 DATED this 12th day of December, 2023.

11 **ANGELI LAW GROUP LLC**

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13 By: s/ Kristen L. Tranetzki
14 KRISTEN TRANETZKI, OSB#115730

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ANGELI LAW GROUP LLC
121 S.W. Morrison Street, Suite 400
Portland, Oregon 97204
Telephone: (503) 954-2232
Facsimile: (503) 227-0880