

**KOLSRUD LAW OFFICES**

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**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

**IN AND FOR THE COUNTY OF MARICOPA**

STATE OF ARIZONA,

Plaintiff,

vs.

LAURA MICHELLE OWENS,

Defendant

Case No.: **CR2025-006831-001**

**MOTION TO MODIFY CONDITIONS  
OF RELEASE TO ALLOW FOR  
TRAVEL**

*Expedited Ruling Requested*

Defendant Laura Owens, by and through undersigned counsel, respectfully moves this Court to modify her release conditions by allowing her to travel to San Diego, California, from September 18<sup>th</sup> through September 26<sup>th</sup>, 2025, for work purposes and to visit family.

The Court previously granted a motion to allow Ms. Owens to travel for the same purposes. Defense counsel was informed that Ms. Owens contracted COVID and was unable to travel for work during the previously requested dates of September 4<sup>th</sup> – 8<sup>th</sup>, 2025, and from September 10<sup>th</sup> - 15<sup>th</sup>, 2025. Ms. Owens now respectfully requests that those dates be amended to September 18<sup>th</sup> through September 26<sup>th</sup>, 2025.

Ms. Owens has been in full compliance with her release conditions and knows that all release conditions remain in place during her travels and afterwards.

1 Counsel for the State, Edward Leiter, has been contacted regarding this motion and has  
2 no objection.

3 Based on the foregoing, undersigned counsel respectfully requests that the Court issue  
4 an Order amending Ms. Owens' travel schedule to San Diego, California, to reflect the  
5 dates of September 18, 2025, through September 26, 2025.  
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7 RESPECTFULLY SUBMITTED this 16<sup>th</sup> day of September, 2025.  
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9 **KOLSRUD LAW OFFICES**

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11 /s/ Sandra Schutz  
12 Sandra Schutz, Esq.  
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1 **ORIGINAL** of the foregoing e-filed this 16<sup>th</sup> day of September, 2025

2 <https://efiling.clerkofcourt.maricopa.gov/>

3 **COPIES** of the foregoing emailed this 16<sup>th</sup> day of September, 2025

4 **The Honorable Jeffery Rueter**

5 Maricopa County Superior Court

6 175 W. Madison Street

7 Phoenix, AZ 85003

8 [Rachele.Stock@jbazmc.maricopa.gov](mailto:Rachele.Stock@jbazmc.maricopa.gov)

9 **Edward Leiter**

10 Maricopa County Attorney's Office

11 225 W. Madison Street

12 Phoenix, AZ 85003

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14 By: /s/ Nevaeh Morales

15 Nevaeh Morales, Paralegal

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