

IN THE CIRCUIT COURT OF THE
NINTH JUDICIAL CIRCUIT, IN AND
FOR ORANGE COUNTY, FLORIDA

STATE OF FLORIDA,

Plaintiff,

vs.

CASE NO.: 48-2008-CF-015606-O

DIVISION: 16

JUDGE: BELVIN PERRY, JR.

CASEY MARIE ANTHONY,

Defendant.

**MOTION FOR APPROVAL OF INVESTIGATIVE HOURS
FOR THE PENALTY PHASE**

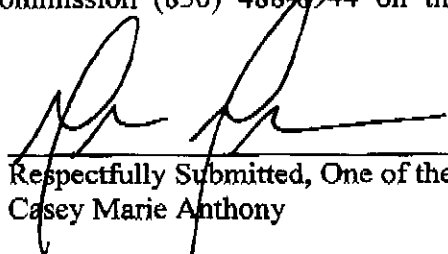
COMES NOW the Defendant, CASEY MARIE ANTHONY, by and through undersigned counsel, and moves this Honorable Court to enter an Order for approval of investigative hours for the penalty phase and in support thereof the Defendant would state the following:

1. On September 30, 2010, the defense filed a Motion requesting a \$5,000 cap for investigative services for the penalty phase.
2. At the October 29, 2010, status hearing, the Court reserved ruling on this request pending defense submission to the court of an itemized list of investigative services needed in support thereof. (See Exhibit A).
3. All services listed in the itemized list of investigative services comply with the policies and procedures established by the JAC and the Indigent Services Committee.
4. Without an Order signed by this Court, the JAC cannot approve the investigative hours already rendered for the penalty phase and pending submission.

WHEREFORE the Defendant, CASEY MARIE ANTHONY, by and through undersigned counsel, prays that this Honorable Court to enter an Order for investigative hours for the penalty phase and/or a monetary cap and/or further relief as this Court deems just and equitable for the interest of judicial economy, and trial being less than 4 months away.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing has been furnished to the Orange County Clerk of Court 425 North Orange Ave., Orlando, Florida 32802; to the Office of the State Attorney, 415 North orange Avenue, Orlando, Florida 32801 by facsimile/ delivery; and to the Justice Administrative Commission, P.O. Box 1654, Tallahassee, FL 32302 and/or by facsimile to the Justice Administrative Commission (850) 488-8944 on this 19th day of January, 2011.



Respectfully Submitted, One of the Attorneys for
Casey Marie Anthony

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IN THE CIRCUIT COURT OF THE
NINTH JUDICIAL CIRCUIT, IN AND
FOR ORANGE COUNTY, FLORIDA

STATE OF FLORIDA,

Plaintiff,

vs.

CASE NO.: 48-2008-CF-015606-O

DIVISION: 16

JUDGE: BELVIN PERRY, JR.

CASEY MARIE ANTHONY,

Defendant.

_____ /

**ORDER ON MOTION FOR APPROVAL OF INVESTIGATIVE HOURS
FOR THE PENALTY PHASE**

THIS CAUSE having come to be heard this ____ day of _____, 2011, the Court, having reviewed the motion for approval of investigative hours for the penalty phase and being otherwise fully advised,

ORDERS ADJUDGES AS FOLLOWS:

- 1. The Defendant's Motion is hereby,

_____ **GRANTED** _____ **DENIED**

Other:

DONE AND ORDERED in Chambers at Orlando, Orange County, Florida on this the ____ day of _____, 2011.

HONORABLE BELVIN PERRY, JR. JUDGE
CIRCUIT CRIMINAL DIVISION

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing has been furnished to the Orange County Clerk of Court 425 North Orange Ave., Orlando, Florida 32802; to the Office of the State Attorney, 415 North orange Avenue, Orlando, Florida 32801 by facsimile/ delivery; and to the Justice Administrative Commission, P.O. Box 1654, Tallahassee, FL 32302 and/or by facsimile to the Justice Administrative Commission (850) 488-8944; to the Baez Law Firm, 522 Simpson Rd., Kissimmee, FL 34744 on this ____ day of _____, 2011.

JUDICIAL ASSISTANT

Investigator Mileage Log

Case Number: 48-2008-CF-15606

Date	From	To	Purpose	Miles
12/8/10	Orlando, FL	Various Locations	Mitigation Witness Interview	96
12/9/10	Orlando, FL	Various Locations	Mitigation Witness Interview	141
12/11/10	Orlando, FL	Various Locations	Mitigation Witness Interview	109
12/14/10	Orlando, FL	Various Locations	Mitigation Witness Interview	83
12/15/10	Orlando, FL	Various Locations	Mitigation Witness Interview	117
12/18/10	Orlando, FL	Various Locations	Mitigation Witness Interview	90
12/20/10	Orlando, FL	Various Locations	Mitigation Witness Interview	88
12/21/10	Orlando, FL	Various Locations	Mitigation Witness Interview	12
12/21/10	Kissimmee, FL	Ormond Beach, FL	Mitigation Witness Interview	89
12/21/10	Ormond Beach, FL	Kissimmee, FL	Mitigation Witness Interview	89
12/22/10	Orlando, FL	Various Locations	Mitigation Witness Interview	75
12/23/10	Orlando, FL	Various Locations	Mitigation Witness Interview	84
12/27/10	Orlando, FL	Various Locations	Mitigation Witness Interview	95
12/28/10	Orlando, FL	Various Locations	Mitigation Witness Interview	68
12/29/10	Orlando, FL	Various Locations	Mitigation Witness Interview	66
			Total Miles	1,302
			Per Mile	\$0.442
			Total Reimbursable Amount	\$579.39

Investigator Invoice

Case Number:	Case Caption: Mitigation Phase - Casey Anthony
Investigative Firm Name Intelli-Investigations, LLC	Attorney requesting services Law offices of Jose Baez
Class A License # A2500267	

Date	Description of Services	Investigator Who Provided Service	License Number & Type (Class C or CC)	Time (increments of hours & 10ths of an hour)	Rate (Class CC Investigators may bill at 60% of Class C Investigator rate)	Subtotal (Line Total)
11/30/10	Initial call to Mitigation Attorney AF's office	K Delaney	CC2900254	.1	24.00	2.40
12/1/10	Call to Mitigation Attorney AF's office to obtain contact information	K Delaney	CC2900254	.2	24.00	4.80
12/1/10	Call with Mitigation Attorney AF to review mitigation phase	K Delaney	CC2900254	.3	24.00	7.20
12/1/10	Received informational emails on mitigation case, reviewed emails, and forwarded to Lead Investigator	K Delaney	CC2900254	.5	24.00	12.00
12/1/10	Sent emails to Mitigation Attorney AF and Mitigation Specialist JB with contact information	K Delaney	CC2900254	.5	24.00	12.00
12/1/10	Reviewed emails, scheduled conference call with Mitigation Specialist JB	K Delaney	CC2900254	.3	24.00	7.20
12/2/10	Call to Mitigation Specialist JB re: conference call	K Delaney	CC2900254	.1	24.00	2.40
12/3/10	Conference call with Lead Investigator GC	K Delaney	CC2900254	.8	24.00	19.20

Investigator Invoice

12/3/10	Review and print spreadsheets for conference call	K Delaney	CC2900254	.4	24.00	9.60
12/3/10	Call to Lead Investigator GC re: missed conference call	K Delaney	CC2900254	.4	24.00	9.60
12/3/10	Email to Mitigation Specialist JB re: questions for conference call	K Delaney	CC2900254	.1	24.00	2.40
12/3/10	Compared Motion witness list to Mitigation Witness Excel spreadsheet in preparation for conference call	K Delaney	CC2900254	.50	24.00	12.00
12/3/10	Conference call with Mitigation Specialist JB re: rescheduling cc	K Delaney	CC2900254	.3	24.00	7.20
12/6/10	Review mitigation witness list and interviews before conference call	K Delaney	CC2900254	.8	24.00	14.40
12/6/10	Conference call with Mitigation Specialist JB Lead Investigator GC re: interviews, location and follow-up items	K Delaney	CC2900254	.8	24.00	19.20
12/6/10	Conference call with Lead Investigator GC re: investigator plan of action	K Delaney	CC2900254	.5	24.00	12.00
12/6/10	Memo to Lead Investigator GC re: conference call minutes	K Delaney	CC2900254	.5	24.00	12.00
12/6/10	Reviewed updated spreadsheet from Mitigation Specialist JB, witness location research	K Delaney	CC2900254	.7	24.00	16.80
12/7/10	Updated addresses for witnesses, sorted witness list by zip code and missing addresses	K Delaney	CC2900254	1.00	24.00	24.00
12/7/10	Address lookup/directions on	K Delaney	CC2900254	1.00	24.00	24.00

Investigator Invoice

12/7/10	internet	K Delaney	CC2900254	.50	24.00	12.00
	Conference call with Lead Investigator GC					
12/8/10	Conference call with Lead Investigator GC	K Delaney	CC2900254	.2	24.00	4.80
12/8/10	Investigative Report Writing re: visits and interviews on 12/8	K Delaney	CC2900254	1.2	24.00	26.40
					Total Invoiced	273.60

Investigator Invoice

Case Number:	Case Caption: Mitigation Phase - Casey Anthony
Investigative Firm Name Intelli-Investigations, LLC	Attorney requesting services Law offices of Jose Baez
Class A License # A2500267	

Date	Description of Services	Investigator Who Provided Service	License Number & Type (Class C or CC)	Time (Increments of hours & 10ths of an hour)	Rate (Class CC Investigators may bill at 60% of Class C Investigator rate)	Subtotal (Line Total)
12/9/10	Telephone call with Lead Investigator GC	K Delaney	CC2900254	.3	24.00	7.20
12/9/10	Mitigation witness address review & mapping	K Delaney	CC2900254	.5	24.00	12.00
12/11/10	Investigative Report writing re: visits and interviews on 12/9	K Delaney	CC2900254	.5	24.00	12.00
12/11/10	Investigative Report writing re: visits and interviews 12/11	K Delaney	CC2900254	.9	24.00	21.60
12/13/10	Revised Investigative Reports, revised and updated Mitigation Witness Excl spreadsheet, emailed to Mitigation Attorney AF, Mitigation Specialist JB, Lead Investigator GC	K Delaney	CC2900254	2.5	24.00	60.00
12/13/10	Conference call with Lead Investigator GC	K Delaney	CC2900254	.4	24.00	9.60

Investigator Invoice

12/13/10	Telephone interview with out of state witness	K Delaney	CC2900254	.4	24.00	9.60
12/13/10	Investigative Report Writing re: out of state witness	K Delaney	CC2900254	.2	24.00	4.80
12/15/10	Conference call with Lead Investigator GC	K Delaney	CC2900254	.3	24.00	7.20
12/15/10	Telephone call with witness	K Delaney	CC2900254	.1	24.00	2.40
12/16/10	Telephone call with witness	K Delaney	CC2900254	.2	24.00	4.80
12/16/10	Telephone call with Lead Investigator GC	K Delaney	CC2900254	.5	24.00	12.00
12/16/10	Witness location research	K Delaney	CC2900254	1.4	24.00	33.60
12/16/10	Telephone call with Lead Investigator GC	K Delaney	CC2900254	.1	24.00	2.40
12/16/10	Updated witness list and emailed to Lead Investigator GC	K Delaney	CC2900254	.6	24.00	14.40
12/17/10	Mitigation Witness Reports	K Delaney	CC2900254	.5	24.00	12.00
12/18/10	Witness address lookup	K Delaney	CC2900254	.6	24.00	14.40
12/18/10	Telephone interview with out of state witness	K Delaney	CC2900254	.2	24.00	4.80
12/18/10	Telephone call to out of state witness	K Delaney	CC2900254	.1	24.00	2.40
12/18/10	Telephone call to witness to request information	K Delaney	CC2900254	.1	24.00	2.40
12/18/10	Telephone call to witness to follow up	K Delaney	CC2900254	.1	24.00	2.40
Total Invoiced						252.00

Investigator Invoice

Case Number:	Case Caption: Mitigation Phase - Casey Anthony
Investigative Firm Name Intelli Investigations, LLC	Attorney requesting services Law office of Jose Baez
Class A License # A2500267	

Date	Description of Services	Investigator Who Provided Service	License Number & Type (Class C or CC)	Time (Increments of hours & 10ths of an hour)	Rate (Class CC Investigators may bill at 60% of Class C Investigator rate)	Subtotal (Line Total)
12/28/10	Address mapping for interview attempts	K Delaney	CC2900254	.3	24.00	7.20
12/28/10	Travel to Mitigation witness Interview attempt	K Delaney	CC2900254	.1	24.00	2.40
12/28/10	Mitigation Witness Interview attempt - no answer	K Delaney	CC2900254	.1	24.00	2.40
12/28/10	Travel to mitigation witness interview attempt	K Delaney	CC2900254	.3	24.00	7.20
12/28/10	Mitigation Witness interview attempt - no answer, no answer at neighbor's house	K Delaney	CC2900254	.1	24.00	2.40
12/28/10	Travel to Mitigation Witness interview attempt	K Delaney	CC2900254	.9	24.00	21.60
12/28/10	Mitigation Witness interview attempt - new tenant said witness lives downtown	K Delaney	CC2900254	.1	24.00	2.40
12/27/10	Travel to Mitigation Witness interview attempt	K Delaney	CC2900254	.3	24.00	7.20
12/28/10	Mitigation Witness Interview attempt - no answer	K Delaney	CC2900254	.1	24.00	2.40
12/28/10	Travel to Mitigation Witness interview attempt	K Delaney	CC2900254	.5	24.00	12.00
12/28/10	Mitigation Witness Interview attempt	K Delaney	CC2900254	.4	24.00	9.60
12/28/10	Travel to Mitigation witness interview attempt	K Delaney	CC2900254	.2	24.00	4.80
12/28/10	Mitigation Witness interview attempt - no answer	K Delaney	CC2900254	.1	24.00	2.40
12/28/10	Travel to Mitigation Witness	K Delaney	CC2900254	.5	24.00	12.00

Investigator Invoice

Case Number:	Case Caption: Mitigation Phase - Casey Anthony
Investigative Firm Name Intelli Investigations, LLC	Attorney requesting services Law office of Jose Baez
Class A License # A2500267	

Date	Description of Services	Investigator Who Provided Service	License Number & Type (Class C or CC)	Time (Increments of hours & 10ths of an hour)	Rate (Class CC Investigators may bill at 80% of Class C Investigator rate)	Subtotal (Line Total)
12/27/10	Conference call with Lead Investigator GC	K Delaney	CC2900254	.1	24.00	2.40
12/27/10	Address mapping for interviews	K Delaney	CC2900254	.2	24.00	4.80
12/27/10	Travel to Mitigation witness interview	K Delaney	CC2900254	.7	24.00	16.80
12/27/10	Mitigation Witness interview attempt - no answer	K Delaney	CC2900254	.1	24.00	2.40
12/27/10	Travel to Mitigation Witness interview attempt	K Delaney	CC2900254	.4	24.00	9.60
12/27/10	Mitigation Witness interview attempt - no answer	K Delaney	CC2900254	.1	24.00	2.40
12/27/10	Travel to Mitigation Witness interview attempt	K Delaney	CC2900254	.2	24.00	4.80
12/27/10	Mitigation Witness Interview	K Delaney	CC2900254	.4	24.00	9.60
12/27/10	Travel to Mitigation Witness interview attempt	K Delaney	CC2900254	.4	24.00	9.60
12/27/10	Mitigation Witness Interview attempt - no answer	K Delaney	CC2900254	.1	24.00	2.40
12/27/10	Travel to Mitigation Witness interview attempt	K Delaney	CC2900254	.5	24.00	12.00
12/27/10	Mitigation Witness Interview attempt- no answer, neighbor does not know if witness still lives next door	K Delaney	CC2900254	.1	24.00	2.40
12/27/10	Travel to Mitigation Witness interview attempt	K Delaney	CC2900254	.6	24.00	14.40
12/27/10	Mitigation Witness interview attempt - no answer, neighbor	K Delaney	CC2900254	.1	24.00	2.40

Investigator Invoice

Case Number:	Case Caption: Mitigation Phase - Casey Anthony
Investigative Firm Name Intelli Investigations, LLC	Attorney requesting services Law office of Jose Baez
Class A License # A2500267	

Date	Description of Services	Investigator Who Provided Service	License Number & Type (Class C or CC)	Time (Increments of hours & 10ths of an hour)	Rate (Class CC Investigators may bill at 60% of Class C Investigator rate)	Subtotal (Line Total)
12/23/10	Conference call with Lead Investigator GC	K Delaney	CC2900254	.1	24.00	2.40
12/23/10	Review state witness list (101 pages) for mitigation witness addresses	K Delaney	CC2900254	.5	24.00	12.00
12/23/10	Address mapping for witness visits	K Delaney	CC2900254	.1	24.00	2.40
12/23/10	Call to mitigation witness's attorney WL to set up interview	K Delaney	CC2900254	.1	24.00	2.40
12/23/10	Call to mitigation witness to follow up on interview questions	K Delaney	CC2900254	.1	24.00	2.40
12/23/10	Travel to Mitigation Witness interview attempt	K Delaney	CC2900254	.3	24.00	7.20
12/23/10	Mitigation Witness interview attempt	K Delaney	CC2900254	.2	24.00	4.80
12/23/10	Travel to Mitigation Witness interview attempt	K Delaney	CC2900254	.9	24.00	21.60
12/23/10	Mitigation Witness interview attempt - no answer	K Delaney	CC2900254	.1	24.00	2.40
12/23/10	Travel to Mitigation Witness attempt	K Delaney	CC2900254	.4	24.00	9.60
12/23/10	Mitigation Witness interview attempt - no answer	K Delaney	CC2900254	.1	24.00	2.40
12/23/10	Travel to Mitigation Witness Interview attempt	K Delaney	CC2900254	.2	24.00	4.80
12/23/10	Mitigation Witness interview attempt - no answer	K Delaney	CC2900254	.1	24.00	2.40
12/23/10	Travel to Mitigation Witness interview attempt	K Delaney	CC2900254	.5	24.00	12.00

Investigator Invoice

12/23/10	Mitigation Witness interview attempt - no answer	K Delaney	CC2900254	.1	24.00	2.40
12/23/10	Travel to Mitigation Witness interview attempt	K Delaney	CC2900254	1.3	24.00	31.20
12/23/10	Mitigation Witness Interview attempt	K Delaney	CC2900254	.1	24.00	2.40
12/23/10	Travel to Investigator home	K Delaney	CC2900254	.4	24.00	9.60
12/23/10	Review of state witness list for witness address	K Delaney	CC2900254	.2	24.00	4.80
12/23/10	Update of mitigation witness spreadsheet	K Delaney	CC2900254	.6	24.00	14.40
12/23/10	Address lookup of priority list from Mitigation Specialist .JB	K Delaney	CC2900254	.2	24.00	4.80
					Total Invoiced	158.40

Investigator Invoice

Case Number:	Case Caption: Mitigation Phase - Casey Anthony
Investigative Firm Name Intelli Investigations, LLC	Attorney requesting services Law office of Jose Baez
Class A License # A2500267	

Date	Description of Services	Investigator Who Provided Service	License Number & Type (Class C or CC)	Time (Increments of hours & 10ths of an hour)	Rate (Class CC Investigators may bill at 60% of Class C Investigator rate)	Subtotal (Line Total)
12/22/10	Travel to Mitigation Witness interview	K Delaney	CC2900254	.3	24.00	7.20
12/22/10	Mitigation Witness Interview	K Delaney	CC2900254	.3	24.00	7.20
12/22/10	Travel to Investigator home	K Delaney	CC2900254	.3	24.00	7.20
12/22/10	Investigative report	K Delaney	CC2900254	.8	24.00	19.20
12/22/10	Call to Lead Investigator JC re: addresses for priority list from Mitigation Specialist JB	K Delaney	CC2900254	.2	24.00	4.80
12/22/10	Call from Lead Investigator GC	K Delaney	CC2900254	.4	24.00	9.60
12/22/10	Mitigation Witness address lookup	K Delaney	CC2900254	.4	24.00	9.60
12/22/10	Travel to Mitigation Witness interview attempt	K Delaney	CC2900254	.4	24.00	9.60
12/22/10	Mitigation Witness interview attempt - not at that address	K Delaney	CC2900254	.1	24.00	2.40
12/22/10	Travel to Mitigation Witness attempt	K Delaney	CC2900254	.7	24.00	16.80
12/22/10	Mitigation Witness interview attempt - no answer	K Delaney	CC2900254	.1	24.00	2.40
12/22/10	Travel to Mitigation Witness interview attempt	K Delaney	CC2900254	.4	24.00	9.60
12/22/10	Mitigation Witness interview attempt - no answer	K Delaney	CC2900254	.1	24.00	2.40
12/22/10	Travel to Mitigation Witness interview attempt	K Delaney	CC2900254	.2	24.00	4.80
12/22/10	Mitigation Witness interview attempt - not working today	K Delaney	CC2900254	.1	24.00	2.40
12/22/10	Travel to Mitigation Witness interview attempt	K Delaney	CC2900254	.6	24.00	14.40

Investigator Invoice

Case Number:	Case Caption: Mitigation Phase - Casey Anthony
Investigative Firm Name Intelli Investigations, LLC	Attorney requesting services Law office of Jose Baez
Class A License # A2500267	

Date	Description of Services	Investigator Who Provided Service	License Number & Type (Class C or CC)	Time (Increments of hours & 10ths of an hour)	Rate (Class CC Investigators may bill at 60% of Class C Investigator rate)	Subtotal (Line Total)
12/21/10	Investigator/Attorney conference	K Delaney	CC2900254	2.4	24.00	57.60
12/21/10	Travel to Mitigation Witness interview	K Delaney	CC2900254	.7	24.00	16.80
12/21/10	Mitigation Witness interview attempt - not home, try work	K Delaney	CC2900254	.1	24.00	2.40
12/21/10	Travel to Mitigation Witness interview	K Delaney	CC2900254	.4	24.00	9.60
12/21/10	Mitigation Witness interview attempt (mail)	K Delaney	CC2900254	.5	24.00	12.00
12/21/10	Travel to Mitigation Witness interview attempt	K Delaney	CC2900254	.4	24.00	9.60
12/21/10	Mitigation Witness interview attempt - invalid address	K Delaney	CC2900254	.1	24.00	2.40
12/21/10	Travel to Mitigation Witness interview attempt	K Delaney	CC2900254	.5	24.00	12.00
12/21/10	Telephone call from Lead Investigator to follow up on new lead work address	K Delaney	CC2900254	.1	24.00	2.40
12/21/10	Mitigation Witness interview attempt - no answer	K Delaney	CC2900254	.2	24.00	4.80
12/21/10	Travel to Mitigation Witness interview attempt	K Delaney	CC2900254	.3	24.00	7.20
12/21/10	Mitigation Witness interview attempt - not available, stepped out	K Delaney	CC2900254	.3	24.00	7.20
12/21/10	Travel to Mitigation Witness interview attempt	K Delaney	CC2900254	.3	24.00	7.20
12/21/10	Mitigation Witness interview	K Delaney	CC2900254	.1	24.00	2.40

