

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

STATE OF FLORIDA,

CASE NO.: 48-2008-CF-0015606-O

Chief Judge: Belvin Perry, Jr.

Plaintiff,

v.

CASEY MARIE ANTHONY,

Defendant.

WITH ATTACHMENTS

MOTION TO RESTRICT IN COURT PHOTOGRAPHY/VIDEOING

COMES NOW the Defendant, CASEY MARIE ANTHONY, by and through her undersigned attorney, and moves this Court for entry of its Order restricting the use of certain in court photograph by still camera and video camera, and shows:

1. This Court has the specific authority to control courtroom photography, pursuant to the "Amended Administrative Order Governing Proceedings of General Media Interest and Procedures for Special Interest/High Profile Proceedings", Administrative Order No. 07-96-19-01.
2. The trial and proceedings regarding the above-styled cause are undisputedly "special interest/high profile proceedings".
3. It recently has come to the attention of your undersigned counsel that photographs taken by a designated still camera photographer have been made by the use of extensive telephoto equipment, facilitating the invasion of the Defendant's conference with counsel in reviewing documents.
4. At a recent hearing, the still photographer, utilizing super telephoto equipment,

focused on the Defendant during a discussion with counsel and on the document the Defendant was reading. Said photograph was thereafter posted on the internet. A copy of said photo is attached hereto as Exhibit "A".

5. At another recent hearing, defense counsel observed what, in good faith, was believed to be a further attempt by the still camera photographer, using such super telephoto equipment, to discover a note being written by the Defendant to her counsel.
6. Historically in this case, there have been prior breaches of protocol revealed by video cameras attempting to, with the use of telephoto enhancement, view messages between defense counsel and the Defendant, and with co-counsel.
7. There is no justification, whatsoever, in allowing any photographic means, be it still camera or video camera, to utilize telephoto enhancement technologies such as to be able to invade the confidences between the Defendant and her counsel.
8. The Defendant requests this Court prohibit the use of any telephoto equipment on any form of media in the courtroom.
9. In addition to the telephoto photography issues, the conversations between and amongst defense counsel and the Defendant have been apparently broadcasted and distributed to the public by the media without the knowledge of your undersigned counsel and also in serious violation of the Defendant's Constitutional Rights and the specific provisions of this Court's Administrative Order. See Section I(j).
10. The Defendant specifically requests, on the issue of audio "eavesdropping" and broadcasting, that the Court order the removal of any microphone or other

broadcasting device of any nature, whatsoever, from in or around the defense counsel table and/or any equipment related thereto that would be capable of overhearing such conversations.

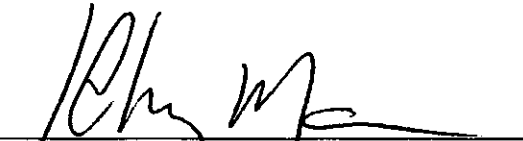
11. Most recently, this privacy was violated by the media broadcasting and as a result bloggers commenting on your undersigned counsel's discussion with co-counsel regarding the numbers of hours already expended in the case and the nature of the work being done. Your undersigned has been informed that one or more of the "bloggers" hearing these surreptitious broadcasts even commented that your undersigned counsel must not know that the "microphone is on". See attached web chat attached hereto as Exhibit "B".
12. At issue in this case is a potential conflict between the Sixth Amendment Rights of the Defendant and the First Amendment Right of the media/public. The rights of the media are not absolute. *Press-Enterprise Co. v. Superior Court of California, Riverside County*, 464 U.S. 501, 510; 104 S.Ct. 819, 824; 78 L.Ed 2d 629 (1984). The claimed right of access by news media through these improper telephoto photographs and/or surreptitious recordings give way to the Defendant's rights to a fair trial. *Waller v. Georgia*, 467 U.S. 39, 45; 104 S.Ct. 2210; 81 L.Ed 2d 31 (1984). If the press can be denied even having access to names of jurors in certain circumstances, then clearly the press has no right to these gross violations of the Defendant's rights as set forth above. *U.S. v. Calabrese*, 515 F.Supp.2d 880 (N.D.Ill.2007).
13. The law requires the Court to narrowly tailor a remedy which can be easily done in

this case. The Court needs only to ensure that microphones and recording devices and the like are disconnected from counsel table and vicinity, and prohibit the use of telephoto lenses on still media cameras and video cameras.

WHEREFORE, the Defendant prays this Court enter its Order prohibiting the use of telephoto lenses in the courtroom and from any recording or broadcasting from counsel table.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail and/or electronic mail to Assistant State Attorneys, Linda Drane-Burdick, Esq. and Jeffrey Ashton, Esq., 415 N. Orange Avenue, Orlando, Florida 32801 AND to Attorneys for the Sentinel, Rachel Fugate, Esq. and Gregg D. Thomas, Esq., 400 N. Ashley Drive, Suite 1100, Tampa, Florida 33602 on this 30th day of December, 2010.



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Facsimile: 407-422-6858
One of the Attorneys for the Defendant

THE BOARD OF DIRECTORS OF THE
FEDERAL RESERVE SYSTEM
WASHINGTON, D.C. 20551

MEMORANDUM FOR THE BOARD OF DIRECTORS
DATE: 12/29/2010
SUBJECT: [Illegible]

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99. [Illegible]

100. [Illegible]



EXHIBIT A

CASEY ANTHONY CASE COVERAGE

Watch It Live | Good Day | Happening Now | Live Traffic Conditions

Seen on TV | MOBILE | Web Cams | Contests | HOT Video | Friday Salute | Blogs | Yellow Pages | Cool Schools | Daily Deals

NEWS | WEATHER | TRAFFIC | SPORTS | MONEY | HEALTH | ENTERTAINMENT | GOOD DAY | JOB SHOP | ABOUT US

DATING! JOBS! HEALTH!

Home : News : Anthony Case :



Image credit: Red Huber, Orlando Sentinel

Large Photo

- FOX 35 coverage of Casey Anthony
- Sign up for Casey Anthony Text Alerts

Anthony Case Coverage

- Casey Anthony returns to court**
Casey Anthony and her defense team were back in court Monday for a status ...
- Anthony defense gets testing approval**
Lawyers for Casey Anthony will get to spend \$2,000 on DNA testing of two items ...
- More discovery released in Anthony case**
The state attorney's office released more than 900 pages of discovery in the ...
- Casey Anthony returns to court**
Casey Anthony was back in court Friday where her attorney Jose Baez failed to ...
- FBI agent questioned by Casey's defense**

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Casey Anthony returns to court

Updated: Monday, 29 Nov 2010, 4:32 PM EST
Published: Monday, 29 Nov 2010, 1:54 PM EST

Casey Anthony and her defense team were back in court Monday for a status hearing on the case. Anthony was dressed in an orange top with her hair pulled up.

Photo Gallery

Watch video of the hearing below

The state filed six motions and was granted two of them by Judge Perry.

The judge approved the state's request for any notes taken by the expert or for the expert while they examined any evidence in this case be turned over to the prosecution. He also ruled in favor of their request for any photographs or video taken by the experts be turned over to prosecutors.

The judge denied the state's request for

- Any contracts or agreements, in any manner or form, setting for the scope of work or expected compensation.
- Any communications between the expert and any member of the defense team, either past or present, or any member of their staff, or any one working on behalf of the Defendant.
- All records of bills submitted by or payments made to the expert.
- All records pertaining to payments for travel, meals or entertainment paid to or for the benefit of the expert or anyone traveling with the expert, by any member of the defense team, either past or present, or any member of their staff, or any one working on behalf of the Defendant.

Anthony has pleaded not guilty on charges that she killed her daughter, 2-year-old Caylee Marie, claiming a babysitter kidnapped her toddler. Caylee was last seen in June of 2008, but she was not reported missing until a month later. Her remains were found in woods near the family's home in December 2008.

Anthony's trial is scheduled to start in May 2011.

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Casey Anthony 2010 Case Photos

- 11/29/10 - Casey in Court
- 10/29/10 - Casey in Court
- 09/21/10 - New Photos Casey & Caylee
- 09/21/10 - New Photos Texas Equusearch
- 09/14/10 - New Defense Members
- 07/15/10 - 911 Calls Hearing
- 07/14/10 - Witnesses look at trunk, trash
- 07/02/10 - Hearing for Special Magistrate
- 06/01/10 - Casey's Courthouse Fall
- 05/11/10 - Death Penalty Motion
- 05/06/10 - Casey in Court
- 04/06/10 - Jailhouse Letters
- 04/05/10 - Equusearch Hearing
- 03/18/10 - Indigencey Hearing

My Fox Orlando Casey Anthony Case

Anonymous: [redacted] Mon Nov 29, 12:33:42pm

SweetSusie: anyone here? Mon Nov 29, 12:33:06pm

SweetSusie: echo echooooo Mon Nov 29, 12:33:06pm

Litigator: with does he want them to call the judge for? Mon Nov 29, 12:37:57pm

Litigator: omgoooo I don't think they know the info is on!!!!

EXHIBIT B



Embed Email

Complete Casey Anthony coverage on MyFoxOrlando.com >>>

SIGN UP FOR ANTHONY TEXTS ALERTS >>>

- ▣ Letters to Casey from parents, family, Set One >>>
- ▣ Letters to Casey from parents, family, Set Two >>>
- ▣ Letters to Casey from strangers, Set One >>>
- ▣ Letters to Casey from strangers, Set Two >>>
- ▣ Letters to Casey from strangers, Set Three >>>
- ▣ Letters to Casey from strangers, Set Four >>>

Anthony Case Documents & Transcripts



2010 Case Docs



2009 Case Docs



2008 Case Docs



Case Transcripts



Caylee Timeline

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YOU MIGHT BE INTERESTED IN

- Defense reviews Equusearch records (MyFox Orlando)
- Casey Anthony back in court Oct. 29 (MyFox Orlando)
- Conway confirms he's out of Anthony case (MyFox Orlando)
- Lead detective in Caylee search deposed (MyFox Orlando)
- New Evidence Photos, Audio Interviews are Released (MyFox Orlando)

FROM AROUND THE WEB

- Police probe whether teen's body fell from airplane (USA TODAY.com)
- California man, 88, charged with murder of wife, 86 (Reuters)
- Circumcision Could Become Illegal in San Francisco -- Can They Do That? (iVillage)
- Rule #1 for Pirate Hostages: Don't Get Stoned (Wired.com)
- Deputy Charged With DUI After Husband Pulls Her Over Twice (YourTango)



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Mon Nov 29, 12:58:04pm
Panscola123: hello

Mon Nov 29, 12:41:19pm
LilLearner: omg he is calling about his hours lol came prepared lol

Mon Nov 29, 12:41:36pm
Panscola123: does anyone have a picture

Mon Nov 29, 12:40:13pm
Orlandogal: Hello all

Mon Nov 29, 12:40:45pm
LilLearner: I am seeing and listening on youtube

Mon Nov 29, 12:40:54pm
LilLearner: they dont know the mic is on

Mon Nov 29, 12:40:51pm
LilLearner: bozo just said he is worried

Mon Nov 29, 12:40:36pm
SweetSusie2: when is everyone watching?

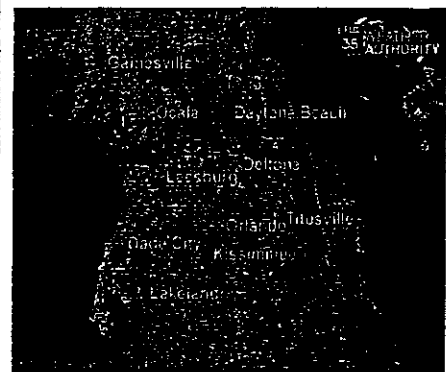
Mon Nov 29, 12:40:49pm
Anon5148:

Mon Nov 29, 12:40:04pm
LilLearner: <http://www.cayleedaily.com/2010/11/casey-anthony-to-appear-in-court-today-3/>

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