

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

COPY

STATE OF FLORIDA,
Plaintiff,

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

v.

CASEY MARIE ANTHONY,
Defendant.

MOTION TO SEAL JAIL VISITING LOG RECORDS

COMES NOW the Defendant, CASEY MARIE ANTHONY, by and through her undersigned attorneys, and moves this Court for entry of its Order directing the Administrator of the Orange County Jail to seal and maintain confidentiality of all records of visitors to the Defendant, CASEY MARIE ANTHONY, and as grounds, therefore, shows:

1. Either by relentless vigilance of news media personnel and/or “tips” from jail personnel, the media is constantly aware of any visits that the Defendant has.
2. The inability to maintain confidentiality of visitors to the Defendant prohibits the defense from being able to properly prepare her case for trial in that the mere identity of some expert witnesses that the defense desires to visit with Miss Anthony, if revealed, will cause unfounded speculation, as well as investigating and “google” inquiries about said visitor, thus, severely hampering the Defendant’s preparation for trial and her entitlements to due process, equal protection of law, and effective assistance of counsel.
3. If the Defendant were at liberty on bond, no media or law enforcement agency would have any ability to know the strategies of the defense preparation and/or potential expert witnesses.
4. Any attempt to assert a claim by media as to thinking they have a “right to know” would be misplaced and is significantly outweighed by the rights of a Defendant,

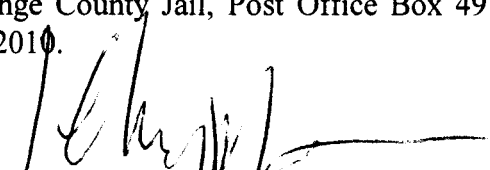
particularly in a capital case.

5. Your undersigned counsel is authorized to represent to this Court that the prosecuting attorneys in this cause “take no position” as to this Motion.

WHEREFORE, the Defendant prays this Court enter its Order directing the administration of the Orange County Jail to ensure the confidentiality of all records of whatever description including, but not limited to, sign-in logs regarding contacts or visits from any persons with the Defendant herein.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail and/or hand delivery to the Office of the State Attorney, 415 N. Orange Avenue, Orlando, Florida 32801 and to Tamara Gapen, Esq., at the Orange County Jail, Post Office Box 4970, Orlando, Florida 32802-4970 this 29th day of April, 2010.



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