

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.

THIRD MOTION FOR ADDITIONAL HOURS OF INVESTIGATION

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

BACKGROUND

1. At the status hearing on May 6, 2010, the Court approved a cap of 300 hours for in state investigative services.
2. The next day, on May 7, 2010, an Amended Order was filed where discovery, motions and hearing deadlines were set for both sides to comply.
3. Since the Amended Order, the State has filed over 5 Supplemental State Witness Lists, which lists 40 additional state witnesses in this case, not including the 300 witnesses that have already been filed.
4. Furthermore, the State has filed 18 Notice of Provision of Supplemental Discovery, which include more than 9,600 pages and 165 audio files of discovery, all of which need to be reviewed and investigated by the defense.

FIRST REQUEST FOR ADDITIONAL INVESTIGATIVE HOURS

5. By October 29, 2010, the in-state investigative hours totaled approximately 400.7 hours all of which complied with the policies and procedures established by the JAC and the Indigent Services Committee.
6. The JAC contacted the defense requesting a new Order signed by this Court granting additional investigative hours.
7. As a result, the defense requested an additional 300 hours at the October 30th, 2010 status hearing.
8. At the hearing, the Court denied the defense's request, and granted only 60 hours of in-state investigative services, leaving approximately 40.7 hours outstanding.

SECOND REQUEST FOR ADDITIONAL INVESTIGATIVE HOURS

9. Due to the outstanding hours, which continued to comply with the JAC, a new Order needed to be filed granting additional hours.
10. Accordingly, the defense filed a second Motion requesting 300 additional in-state investigative hours.
11. The Motion was heard telephonically on December 14th, 2010, which by that time the total in-state investigative hours was approximately 120.7 hours (including the prior 40.7 hours).
12. The Court denied the defense's request for an additional 300 hours, and granted only 110 hours of in-state investigative services, leaving approximately 10.7 hours outstanding.

THIRD REQUEST FOR ADDITIONAL INVESTIGATIVE HOURS

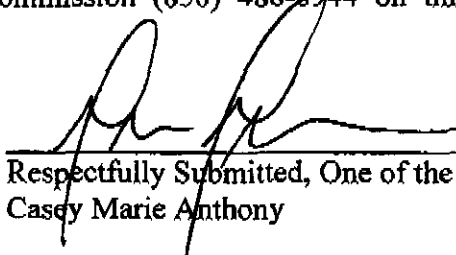
13. As of today, the total in-state investigative hours are approximately 106.2 hours (including the prior 10.7 hours) pending review of this Motion.
14. Without a new Order the JAC cannot approve the in-state investigative hours which continue to comply with the JAC.
15. Therefore, in the interest of judicial economy, and trial being less than 4 months away, the defense is respectfully requesting an additional 300 hours for in-state investigative services to include the 106.2 hours and continued investigation of

the State's discovery, which as illustrated above, continues to be on-going until further notice by this Court.

WHEREFORE the Defendant, CASEY MARIE ANTHONY, by and through undersigned counsel, prays that this Honorable Court to enter an Order for additional hours of investigation and for such other further relief as this Court deems just and equitable.

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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NINTH JUDICIAL CIRCUIT, IN AND
FOR ORANGE COUNTY, FLORIDA

STATE OF FLORIDA,

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JUDGE: BELVIN PERRY, JR.

CASEY MARIE ANTHONY,

Defendant.

ORDER ON THIRD MOTION FOR ADDITIONAL HOURS OF INVESTIGATION

THIS CAUSE having come to be heard this ____ day of _____, 2011, the Court, having reviewed the Third Motion for Additional Hours of Investigation 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

JEREMIAH LYONS INVESTIGATIONS
1961 SE Camden Street
Port St. Lucie, FL 34952

Invoice

Date 1/1/2011
Invoice # 11-001

Bill To
The Baez Law Firm
Jose Baez
522 Simpson Road
Kissimmee, FL 34744

Ship To

P.O. # Casey Anthony
Terms Due on receipt

Ship Date 1/1/2011
Due Date 1/1/2011
Other

Item	Description	Qty	Price	
Investigation	November 23, 2010 - At Judge's direction conducted TES generated phone calls from Court House	5	40.00	200.00
Investigation	November 24, 2010 - At Judge's direction conducted TES generated phone calls from Court House	10	40.00	400.00
Investigation	November 26, 2010 - Interview and attempt to interview witnesses	10	40.00	400.00
Investigation	November 27, 2010 - Interview and attempt to interview witnesses	10	40.00	400.00
Investigation	November 29, 2010 - Interview and attempt to interview witnesses	5	40.00	200.00

Subtotal	\$1,600.00
Sales Tax (6.5%)	\$0.00
Total	\$1,600.00
Payments/Credits	\$0.00
Balance Due	\$1,600.00

JEREMIAH LYONS INVESTIGATIONS
A 2900243

772-812-6430

JEREMIAH LYONS INVESTIGATIONS
 1961 SE Camden Street
 Port St. Lucie, FL 34952

Invoice

Date 1/1/2011
 Invoice # 11-002

Bill To
 The Baez Law Firm
 Jose Baez
 522 Simpson Road
 Kissimmee, FL 34744

Ship To

P.O. # Casey Anthony
 Terms Due on receipt

Ship Date 1/1/2011
 Due Date 1/1/2011
 Other

Item	Description	Qty	Price	
Investigation	December 1, 2010 - Interview and attempt to interview witnesses	3	40.00	120.00
Investigation	December 2, 2010 - Interview and attempt to interview witnesses	2	40.00	80.00
Investigation	December 5, 2010 - Interview and attempt to interview witnesses	2	40.00	80.00
Investigation	December 9, 2010 - Interview witnesses	6	40.00	240.00
Investigation	December 18, 2010 - Defense Team Meeting	8	0.00	0.00
Investigation	December 27, 2010 - Interview witnesses	7	40.00	280.00

Subtotal	\$800.00
Sales Tax (6.5%)	\$0.00
Total	\$800.00
Payments/Credits	\$0.00
Balance Due	\$800.00

JEREMIAH LYONS INVESTIGATIONS
 A 2900243

772-812-6430

JEREMIAH LYONS INVESTIGATIONS
 1961 SE Camden Street
 Port St. Lucie, FL 34952

Invoice

Date 1/18/2011
 Invoice # 11-005

Bill To

The Baez Law Firm
 Jose Baez
 522 Simpson Road
 Kissimmee, FL 34744

Ship To

P.O. #	Casey Anthony	Ship Date	1/18/2011
Terms	Due on receipt	Due Date	1/18/2011
		Other	

Item	Description	Qty	Rate	Total
Investigation	January 2, 2011 - Interview and attempt to interview witnesses	3	40.00	120.00
Investigation	January 3, 2011 - Interview and attempt to interview witnesses	6	40.00	240.00
Investigation	January 4, 2011 - Interview witnesses in the Gainesville and Ocala area	7.5	40.00	300.00
Investigation	January 6, 2011 - Prepare Discovery for State and also read Discovery as it pertains to witnesses	4	40.00	160.00
Investigation	January 7, 2011 - Prepare Discovery for State	2	40.00	80.00
Investigation	January 9, 2011 - Drive to Tunica, Mississippi for interviews	16.5	0.00	0.00
Investigation	January 9, 2011 - Interview witnesses	2	40.00	80.00
Investigation	January 10, 2011 - Drive from Tunica, Mississippi to Kississimme, Florida	17	0.00	0.00
Investigation	January 11, 2011 - Review Discovery as it pertains to witnesses and attempt to interview witnesses	3	40.00	120.00
Investigation	January 15, 2011 - Defense Team Meeting	8	0.00	0.00

Subtotal	\$1,100.00
Sales Tax (6.5%)	\$0.00
Total	\$1,100.00
Payments/Credits	\$0.00
Balance Due	\$1,100.00

JEREMIAH LYONS INVESTIGATIONS
 A 2900243

772-812-6430