

	)	In the Circuit Court of the
	)	Ninth Judicial Circuit, in and for
	)	Orange County, Florida
STATE OF FLORIDA	)	
	)	Case No.: 482008-CF-0015606-O
v.	)	Division 16
	)	
CASEY MARIE ANTHONY,	)	Hon. Stan Strickland
	)	
Defendant.	)	
	)	

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**MOTION FOR LEAVE TO FILE SUPPLEMENTAL AUTHORITY**

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COMES NOW the Defendant, CASEY MARIE ANTHONY, by and through undersigned counsel, who submits to this Honorable Court supplemental authority that will aid the Court in determining whether Texas Equusearch (TES) should be required to disclose all of the materials in its possession that relate to the search for Caylee Anthony. In submitting this additional authority Miss Anthony states that:

Texas Equusearch (TES) has opposed Miss Anthony's efforts to request copies of all records and materials in the possession of TES relating to the search efforts for her daughter. As reason for this non-disclosure, TES cites primarily, in its August 20, 2009 response, an alleged "chilling effect on future volunteers" which would be triggered by having the volunteers' "identit(ies) and personal information *disclosed and available for publication and broadcast across the media.*" (*emphasis added*).


On February 4, 2010, Mark NeJame, counsel for TES, gave an interview to Orlando News 13. In that interview, Mr. NeJame made several statements regarding Miss Anthony's pending Motion seeking records from TES. *See attached Exhibit A.* Also it is reported that, "NeJame allowed News 13 to examine reports and notes taken by EquuSearch volunteers. They

list team leaders, cell phone numbers of volunteers, details about items found and locations searched." Exhibit A.

The disclosure by Mr. NeJame of these records, including volunteer names and phone numbers, seriously undercuts the argument made by TES against giving them to Miss Anthony. If disclosure of search records to the media is the source of this "chilling effect" it is not entirely clear why Mr. NeJame allowed Orlando News 13 access to such records. What is clear, however, is that disclosure of the records to Miss Anthony and her defense team would have significantly less of an effect. Being that TES is no longer concerned about the "chilling effect on volunteerism" and has taken to actively allow media access to its records, there is no reason to prevent disclosure to Miss Anthony as well.

WHEREFORE, for the foregoing reasons, Miss Anthony, by and through undersigned counsel, respectfully asks this Honorable Court to consider this additional information in making a decision to revise the previous Order entered and require TES to disclose all materials relating to the searches it conducted relating to Caylee Anthony and provide counsel with copies of everything forthwith.

Respectfully submitted,

  
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ANDREA D. LYON, one of the attorneys  
for CASEY MARIE ANTHONY.

  
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