

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

STATE OF FLORIDA,

CASE NUMBER: 08-CF-0015606-O

Plaintiff,

Vs.

CASEY ANTHONY,

Defendant.

**RESPONSE TO DEFENDANT'S MOTION FOR LEAVE TO FILE SUPPLEMENTAL
AUTHORITY**

COMES NOW, Texas Equusearch, (herein after referred to as "TES"), by and through its undersigned counsel, pursuant to Florida Rules of Criminal Procedure 3.361(c), files its Response to Defendant's Motion for Leave to File Supplemental Authority, and as grounds therefore would state:

1. The Defendant's motion is inaccurate and lacking in demonstrating any proper investigation or due diligence prior to its filing.
2. If counsel for the Defendant had conducted a proper inquiry he would have ascertained that none of the previously approximately 4,000 undisclosed names of the searchers were shown, reviewed, or looked at by Adam Longo, reporter for Central Florida News 13. In fact, those approximately 4,000 names of the searchers were in a separate box and in a separate office located approximately fifteen (15) miles away when Mr. Longo was present. The very limited perusal by Mr. Longo was solely concerning the thirty-two (32) previously disclosed searchers, the information of which has been provided to the counsel for the State and the counsel for the Defendant. It was acknowledged in Court that there was no expectation of privacy as to the limited 32 people. Their identities have been disclosed and are subject to open

discovery and disclosure and are deemed public records by the State. In fact, Mr. Longo, was only allowed to review the documents so that he understood the type of information contained on the reports and did not even review them for specific names, content or personal information. He was not allowed to photocopy, photograph or take notes of any of the thirty-two (32) previously disclosed searchers and no public information was allowed to be disseminated or, was in fact, disseminated about them. The review was purely limited to review the forms and the type of information contained in the reports so that Mr. Longo would be accurate in reporting his story. He never retained any of the names or personal information but was purely interested in the type of information that the forms contained and not the specifics of their content.

3. The undersigned counsel, upon receiving counsel for the Defendant's spurious and specious motion, contacted Adam Longo, reporter for Central Florida News 13, who has fully and completely confirmed and cooberrated the contents of this response.

4. Mr. Longo advised undersigned counsel that he would immediately contact Jose Baez, counsel for the Defendant, and inform him of the issues contained in his motion which has necessitated this response. It has been confirmed that Mr. Longo in fact did communicate this information to Jose Baez, counsel for Casey Anthony.

5. At the time of filing this response, counsel for the Defendant, Jose Baez, has failed to withdraw his inappropriate and inaccurate motion which misrepresents the facts and is wholly and completely erroneous and misleading.

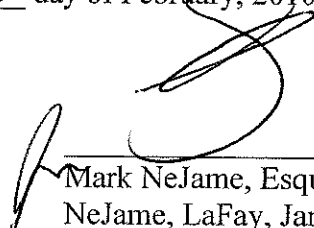
6. A request is hereby made to strike the Defendant's Motion for Leave to File Supplemental Authority, or in the alternative to deny its request.

7. In addition, Texas Equusearch, a nonprofit charitable organization that is the subject of this inappropriate motion and request, respectfully asks this Honorable Court to assess attorney's fees against the counsel for the Defendant, especially since he has been advised of the inaccuracy of his motion and has failed to take any remedial actions. He has caused unnecessary attorney time and Court time to be wasted, especially since he has been fully advised of its misrepresentations and inaccuracies and nevertheless continues to proceed.

WHEREFORE, the undersigned requests that the Defendant's Motion for Leave to File Supplemental Authority be stricken/ denied for the other grounds set forth above.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail/hand delivery to the OFFICE OF THE STATE ATTORNEY, Linda Drane-Burdick, ASA, 415 North Orange Avenue, Orlando, Florida 32801 and Jose Baez, 522 Simpson Road, Kissimmee, Florida 34744 this 10th day of February, 2010.



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