

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

STATE OF FLORIDA,

CASE NO.: 48-2008-CF-15606-O

Plaintiff,

DIVISION: 16

vs.

CASEY MARIE ANTHONY,

Defendant.

**SUPPLEMENTAL MOTION FOR PROTECTIVE ORDER REGARDING A
TELEPHONE RECORDING OF ROBIN LUNCEFORD**

COMES NOW, CASEY ANTHONY by and through undersigned counsel, provides the following information to assist the Court in it's Motion for Protective Order and in support thereof states the following:

1. The telephone call in question was forwarded from the undersigned's office to the undersigned secretary (who handles all after hours calls) to the undersigned cell phone.
2. The undersigned has absolutely no recollection of hearing any recording by the correctional facility.
3. The undersigned maintains that the call contains work product information.
4. In said call, information is given to the undersigned counsel including the names of more potential witnesses.
5. The undersigned has discussed with Assistant State Attorney Linda Drane Burdick to make arrangements for both parties to visit the Lowell Correctional Institution together, and take depositions of all witnesses that may have relevant information to the case at bar.

6. The Defense hereby respectfully requests that if the Court finds that the call does not contain work product, that the Court delay the disclosure to allow enough time for the undersigned to investigate the matters and information supplied within the call.
7. Law enforcement after conducting an interview does not have the obligation to turn over any recorded interviews, until the information contained in those interviews is fully investigated. The Defense seeks the ability to do the same.

WHEREFORE, the Defense respectfully requests that this telephone call be sealed based all aforementioned arguments or in the alternative that disclosure be delayed until both parties have had ample opportunity to investigate the matters contained in the call and to take the depositions of potential witnesses.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via FAX transmission to Linda Drane Burdick, Esquire, Assistant State Attorney, 415 North orange Avenue, Orlando, FL 32801 this 23 day of July, 2010.



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