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

STATE OF FLORIDA Plaintiff,

CASE NO: 48-2008-CF-015606-O

DIVISION: 16

VS.

CASEY MARIE ANTHONY
Defendant.

## MOTION TO COMPEL ADDITIONAL DISCOVERY

COMES NOW the State of Florida through the undersigned and moves this court to enter its order compelling the Defendant to provide, pursuant to F.R.C.P. 3.220(d) and (f), the following additional discovery as to pertain to listed expert witnesses.

- Any contracts or agreements, in any manner or form, setting for the scope of work or expected compensation.
- 2) Any communications between the expert and any member of the defense team, either past or present, or any member of their staff, or any one working on behalf of the Defendant.
- 3) All records of bills submitted by or payments made to the expert.
- 4) All records pertaining to payments for travel, meals or entertainment paid to or for the benefit of the expert or anyone traveling with the expert, by any member of the defense team, either past or present, or any member of their staff, or any one working on behalf of the Defendant.
- 5) Any notes taken by the expert or for the expert during, or referencing their examination of any evidence in this case.
- 6) Any photograph or video taken by the expert in connection with this case.

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The State of Florida requests that any document referenced above to which any privilege is asserted by submitted to this court for in camera inspection and redactions as the courts deems fit. The State request that these documents be produced at a reasonable time but not later than five business days prior to the deposition of the expert.

I HEREBY CERTIFY that a true copy of the foregoing has been furnished to Jose A. Baez, 522 Simpson Road, Kissimmee, FL 34744 counsel for the Defendant, on this 18th day of November, 2010.

Jeffrey L. Ashton Assistant State Attorney Florida Bar # 318337

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