

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
IN AND FOR PASCO COUNTY, STATE OF FLORIDA  
CRIMINAL DIVISION

STATE OF FLORIDA,  
Plaintiff,

Case No.: CRC-1400216CFAES

v.

Division: 1

CURTIS J. REEVES,  
Defendant.

\_\_\_\_\_ /

**JOINT MOTION TO EXTEND DEADLINE FOR FILING RESPONSES TO PRETRIAL  
MOTIONS**

COMES NOW, Defendant, CURTIS J. REEVES, by and through undersigned counsels, and submits this joint motion to extend the deadline for filing responses to pretrial motions and states as follows:

1. On March 11, 2020, this Court set a three-week trial period to begin on October 19, 2020.
2. That same day, the Court set the following deadlines for the filing of pretrial motions and for hearings to be held on those motions:
  - a. Parties' motions were to be filed by June 30, 2020.
  - b. Responses to the parties' motions were to be filed by July 29, 2020.
  - c. All motions were to be heard by August 2020.
3. On June 25, 2020, this Court set a telephonic status check for July 14, 2020.
4. At the July 14, 2020 status check, both parties moved the Court to continue the October 2020 trial date to April 2020 based on the current state of the COVID-19 pandemic in the State of Florida and the operational difficulties presented as a result.
5. The Court granted the parties' request and set a new trial date of April 5, 2020.

6. The Court also set a status hearing for September 14, 2020 at 8:30AM and converted the October 19, 2020-October 21, 2020 trial dates to hearing dates at which the parties' pretrial motions will be heard by the Court.
7. Both the State's and Defendant's pretrial motions are extensive and preparing the responses to these motions involves the reading of numerous, lengthy transcripts. Thus, both parties require more time to prepare their responses.
8. Based on the above, counsels for the Defendant and Assistant State Attorney Glenn Martin have conferred and are jointly requesting for the Court to extend the deadline for both parties to file their responses to the pretrial motions that were filed in this case.
9. The parties are jointly requesting the deadline to be extended to September 18, 2020 in light of the new hearing dates of October 19, 2020-October 21, 2020.

**WHEREFORE**, based on the above, the parties jointly respectfully request this Honorable Court to extend the deadline for filing responses to pretrial motions to September 18, 2020.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of this motion has been furnished by electronic delivery to the Office of the State Attorney for the Sixth Judicial Circuit, c/o Glenn Martin, Esq., at [sa6.glenn.martin@co.pinellas.fl.us](mailto:sa6.glenn.martin@co.pinellas.fl.us) and by U.S. postal service to P.O. Box 5028, Clearwater, Florida 33758 this 16th day of July 2020.

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