

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

STATE OF FLORIDA,  
Plaintiff,

Case No.: CRC-1400216FAES

v.

Division: 1

CURTIS J. REEVES,  
Defendant.

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**DEFENDANT'S MOTION TO STRIKE STATE'S LATE PRETRIAL  
MOTIONS FILED PAST THE COURT'S ORDERED DEADLINE**

COMES NOW, the Defendant, CURTIS J. REEVES, by and through his undersigned counsel, submits the following motion to strike the State's late pre-trial motion filed on September 3, 2020 and any future motions filed in violation of this Court's Order and states as follows:

1. This Court set a pre-trial motions deadline for both parties of June 30, 2020. That deadline passed 73 days ago.
2. The Defendant has adhered to this Court's Order and timely filed all pre-trial motions.
3. This Court originally set a deadline for responses to pre-trial motions of July 29, 2020, but upon joint motion this Court extended the deadline for responses to September 18, 2020.
4. The State did not file a motion to extend the deadline for filing pre-trial motions or otherwise seek leave of court to file any motions past the filing deadline.
5. On September 3, 2020, the State filed an untimely motion: State's Motion *In Limine* to Exclude the Testimony of Defendant Regarding His Character and to Require a Proffer of Defendant's Character Evidence Outside the Presence of the Jury.

6. The State sent a copy of the above referenced motion to the Defendant along with a letter indicating the intention to file more motions past this Court's ordered deadline of June 30, 2020.
7. The Defendant objects to the State's pre-trial motion filed September 3, 2020 and any pre-trial motions filed after June 30, 2020 in violation of the Court's order.

WHEREFORE, the Defendant respectfully requests this Court to strike the State's Motion *In Limine* to Exclude the Testimony of Defendant Regarding His Character and to Require a Proffer of Defendant's Character Evidence Outside the Presence of the Jury and all other late pre-trial motions untimely filed in this matter.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and accurate copy of this has been furnished by Electronic Submission and United States Postal Service to: the Office of the State Attorney for the Sixth Judicial Circuit, P.O. Box 5028, Clearwater, Florida 33758, this 11th day of September, 2020.

/s/ Richard Escobar

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