

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
OF THE STATE OF FLORIDA IN AND FOR PASCO COUNTY
2014CF000216CFAXES-1

2020 SEP 18 PM 1:49

WILLIAMS & BOWEN
Clerk & Comptroller
Pasco County, Florida

Filed for Record
Pasco County, Florida

STATE OF FLORIDA

V.

CURTIS JUDSON REEVES

**State's Response To Defendant's
Motion To Strike State's Late Pretrial
Motions Filed Past The Court's Ordered Deadline**

COMES NOW, Bernie McCabe, State Attorney, for the Sixth Judicial Circuit in and for Pasco County, Florida, by and through the undersigned Assistant State Attorney hereby responds to the *Defendant's Motion To Strike State's Late Pretrial Motions Filed Past The Court's Ordered Deadline* as follows:

On June 23, 2020, one week prior to the due date imposed by the Court, the State filed 15 pleadings in the above-style cause. The pleadings were provided to the defense on an USB key with a letter indicating the State may file additional motions.

The defense contacted the State and suggested that, because of the change in the trial date, the original trial date could be used to hear pretrial motions. The discussion also included when the response should be due. Knowing the defense had multiple responses to draft within 30 days, the State and the defense mutually agreed for the responses due date to be extended to September 18, 2020.

On September, 3, 2020, two weeks prior to the mutually agreed upon due date, the State filed a response to three of the Defendant's motions, along with an additional State Motion in Limine. The responses and the pleading were provided to the defense on an USB key along with a letter indicating the State may file additional motions.

After receiving the above-described letters, the defense did not contact the State and voice an objection to the possibility of additional State Motions in Limine. Instead, on

September 11, 2020, the State received a motion to strike the State's motion filed on September 3, 2020.

The State would only request the same profession courtesy be extended by defense counsel as the State displayed back in July when it agreed to an extension of time to file responses to the original motions.

WHEREFORE the State requests this Court to deny the *Defendant's Motion To Strike State's Late Pretrial Motions Filed Past The Court's Ordered Deadline.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing *State's Response To Defendant's Motion To Strike State's Late Pretrial Motions Filed Past The Court's Ordered Deadline* was furnished to Richard Escobar, Esq., Attorney for the Defendant, at 2917 West Kennedy Blvd., Suite 100, Tampa, FL 33609-3163, by U.S. Mail or Personal Service this 16th day of September, 2020.

BERNIE McCABE, State Attorney
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By 

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