

IN THE CIRCUIT COURT, FOURTH
JUDICIAL CIRCUIT, IN AND FOR
DUVAL COUNTY, FLORIDA.

CASE NO.: 2017CF2246

DIVISION: CRC

STATE OF FLORIDA

VS.

RON HYDE

CONTINGENT NOTICE OF LIMITED DISCOVERY

Defendant hereby files this Contingent Notice of Limited Discovery. It is the intent of undersigned counsel to restrict the amount of information deemed to be “public record” under Chapter 119, Florida Statutes, in order to ensure that a fair and impartial jury can be impaneled in this cause in Duval County, Florida. Defendant recognizes that this contingent notice of limited discovery will obligate him to provide the State with unlimited reciprocal discovery.

If any Court holds that Defendant cannot limit the discovery he chooses to receive from the State, or holds that by requesting limited discovery he “opens the door” to make all of the available or potentially available discovery “public record” in this case, then Defendant revokes this Contingent Notice of Limited Discovery.

Based upon the foregoing and pursuant to Rule 3.220(a), Florida Rules of Criminal Procedure, Defendant hereby gives notice that he intends to participate in discovery to a limited extent and requests that only the below-requested information encompassed by Rule 3.220(b) and (j) be provided to Defendant by the State within 15 days of this Notice:

As to Count 1 only,

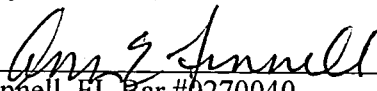
1. The names and addresses of all witnesses, including expert witnesses, who have information relevant to the charge contained in Count 1, or to any defense thereto.
2. All reports of law enforcement written prior to January 1, 2016 which are relevant to the charge contained in Count 1, including any reports wherein the alleged victim was reported to be missing.

3. Copies of all search warrants issued in this cause dealing with Count 1, but not the affidavit or the return.
 4. The reports of all experts who have information relevant to the charge contained in Count 1.
 5. All photographs taken relevant to this investigation prior to January 1, 2016 which are relevant to the charge contained in Count 1.
 6. Whether any witness has received or expects to receive anything in exchange for his or her testimony including but not limited to money, special treatment, forbearance of charges, and reduction of charges.
 7. The names of any witnesses in this cause who have charges pending in this or any other jurisdiction, whether charges have been formally filed or not. *Davis v. Alaska*, 94 S. Ct. 1105 (1974); *Blanco v. State*, 353 So. 2d 602 (Fla. 3d DCA 1977); *Keane v. State*, 357 So. 2d 457 (Fla. 4th DCA 1978).
 8. Whether any state witnesses have recanted their testimony previously given. *Beasley v. State*, 315 So. 2d 540 (Fla. 2d DCA 1975).
 9. Whether any of the State's witnesses have psychiatric histories which may affect their credibility or their ability to relate facts accurately.
 10. Whether any state witness was under the influence of drugs or alcohol at the time he witnessed relevant events in the case. *United States v. Harris*, 542 F. 2d 1283 (7th Cir. 1976); *Morrell v. State*, 335 So. 2d 836 (Fla. 1st DCA 1976).
 11. Whether any witness has identified someone other than the defendant as the perpetrator of the crime charged.
 12. Whether or not information was given by a confidential informer in connection with the case and if yes, whether or not the confidential informer received money or any other benefit.
- As to Counts 2-13:**
1. The names and addresses of all witnesses, including expert witnesses, who may have information relevant to the charged offenses.

2. Copies of all search warrants issued in this cause dealing with Counts 2-13 but not the affidavit or the returns.
3. The reports of all experts who have information relevant to the charges contained in Counts 2-13.

I HEREBY CERTIFY that a copy of the foregoing "Notice of Discovery" has been furnished to the Office of the State Attorney, by e-service, this 15th day of May, 2017.

Respectfully submitted,

BY: 
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