

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

CASE NO.: 16-2017CF002246

DIVISION: CR-C

STATE OF FLORIDA

VS.

RONNIE LEON HYDE

**MOTION TO COMPEL SPECIFIC DISCOVERY AND CONTINGENT MOTION FOR
ADDITIONAL DISCOVERY**

Defendant, RONNIE LEON HYDE, by and through the undersigned attorney, pursuant to Rule 3.220, Florida Rules of Criminal Procedure, respectfully moves this Honorable Court to enter an Order compelling the State to furnish the following requested information:

1. As to witnesses Daisy Laster Price, Richard Laster, Tracey Tyrell, Dawn Williams, Travis Laster, complete current addresses. The State has listed each of these witnesses as "c/o the State Attorney's Office." This is improper unless a protective Order has been sought and granted.
2. As to the discovery provided, Defendant is unable to open the following files:
 - a. Laster Contingent Discovery—>Count 1—>Evidence/Submissions: June 24, 1994 (there are no documents)
 - b. count 1—>leads exhausted—> Richard Rogers —>Ocean Co. torso: FES-93051D0_2_1_2
 - c. count 1 —> leads exhausted—>Richard Rogers: fugifilm
 - d. Count 1 —> NCMEC reports: Joey, Jubito and Hyde

Motion for Severance
of Counts

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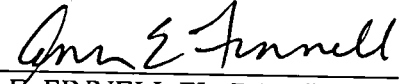
3. Additionally, Defendant requests the following, subject to and incorporating by reference the same contingencies mentioned in his original Contingent Notice of Limited Discovery:
 - a. As to Count 1: all written or recorded statements of all civilian witnesses and the substance of any civilian witness statements contained in police reports .
 - b. As to Count 1: all written or recorded statements of Defendant Ron Hyde and the substance of any such statements contained in police reports together with the names of witnesses present when any such statements were made.
 - c. As to Counts 1 and 2, any tangible papers, objects or substances that the prosecutor intends to use at trial or hearing that were not obtained from Defendant.

WHEREFORE, Defendant respectfully requests this Honorable Court grant this motion.

I HEREBY CERTIFY that a copy of the above and foregoing Motion for Severance of Counts has been furnished to the Office of the State Attorney, by hand, this 29th day of June 2017.

Respectfully submitted,

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