

S.A. CASE NO.: 17CF012484AD

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

CLERK NO.: 162017CF002246AXXMA

DIVISION: CRC

STATE OF FLORIDA

vs.

RONNIE LEON HYDE

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**STATE'S RESPONSE TO DEFENDANT'S MOTION TO COMPEL SPECIFIC  
DISCOVERY AND CONTINGENT MOTION FOR ADDITIONAL DISCOVERY**

Pursuant to Rules 3.190(a) and 3.220(b), Florida Rules of Criminal Procedure, the State of Florida files this response to the correspondingly numbered paragraphs of Defendant's Motion to Compel Specific Discovery and Contingent Motion for Additional Discovery, and says:

1. The State objects to providing the current addresses of the victim's family members. The State has provided counsel for Defendant with a proposed Agreed Protective Order, and the State has no objection to providing addresses of the victim's family members in accordance with the terms of that proposed order.

2. The State has produced the referenced files to Defendant in the same format that law enforcement produced them to the State. The State will permit Defendant to inspect and copy the underlying documents if Defendant is unable to open the files after consulting with the lead Detective.

3. The State believes that the incorporation of the contingencies mentioned in Defendant's original Contingent Notice of Limited Discovery make the requests in this paragraph meaningless because Defendant's original Contingent Notice of Limited Discovery was limited to discovery materials prior to 2010. In the event that Defendant seeks discovery materials in this paragraph that were created or obtained after 2010, the State replies as follows:

- a. The State will produce the requested materials.
- b. The State will produce the requested materials.
- c. The State will permit inspection and copying of the requested materials (consisting largely of voluminous banking and financial records) at the offices of the Federal Bureau of Investigation at a date and time convenient to the parties.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by electronic service to Ann Finnell and Gonzalo Andux, Finnell, McGuinness, Nezami & Andux,

2114 Oak Street, Jacksonville, Florida 32204-4411, this 17th day of July, 2017.

MELISSA W. NELSON  
STATE ATTORNEY

A handwritten signature in black ink, appearing to be 'M. Heavener', enclosed within a hand-drawn circle.

By: \_\_\_\_\_  
Mac D. Heavener, III  
Chief Assistant State Attorney  
Bar Number 896748