

IN THE CIRCUIT COURT, FOURTEENTH JUDICIAL CIRCUIT OF THE STATE OF
FLORIDA, IN AND FOR BAY COUNTY

STATE OF FLORIDA,
Plaintiff,

CASE NO.: 06-4016CF

vs.

HENRY DICKENS
CHARLES ENFINGER
[REDACTED]
RAYMOND HAUCK
[REDACTED]
KRISTIN SCHMIDT
JOSEPH WALSH II

06-4016CFMA
06-4016CFMB
[REDACTED]
06-4016CFMD
[REDACTED]
06-4016CFMF
06-4016CFMG
06-4016CFMHI

**MOTION TO ALLOW ISSUANCE OF
SUBPOENA DUCES TECUM WITHOUT DEPOSITION**

COMES NOW the Defendant, HENRY DICKENS, by and through his undersigned
attorney, and moves this court for entry of an order directing the clerk to issue a subpoena duces
tecum without deposition, and as grounds therefore would show:

1. The Defendant has been accused of the offense of Aggravated Manslaughter of a child. The alleged victim is Martin Lee Anderson.
2. Based upon the discovery conducted, the undersigned has found that the Juvenile Court records, either audio recordings or transcripts, of proceedings during 2005 or January 2006 involving the alleged victim will assist the Defendant in the preparation of his defense.

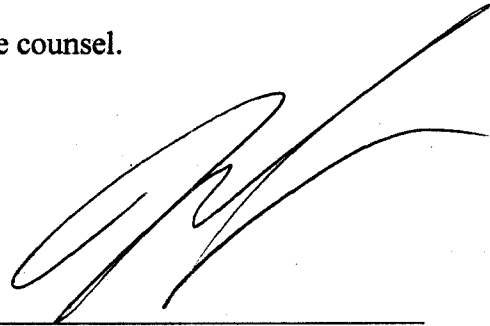
NOW, WHEREFORE, the Defendant respectfully requests that the court will grant this

HAROLD BAZZEL
CLERK OF CIRCUIT COURT
BAY COUNTY, FLORIDA
2007 AUG 23 P 4:03

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motion, and direct the clerk to issue a subpoena duces tecum without deposition for the Juvenile Court recordings or transcripts from any proceedings involving Martin Lee Anderson in 2005 or January 2006 upon the request of the undersigned defense counsel.

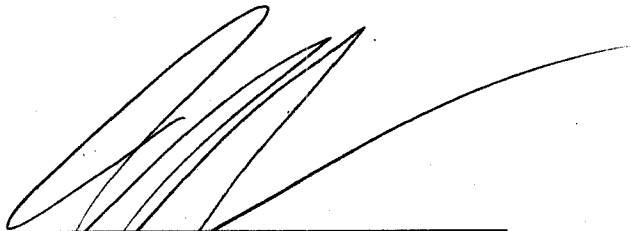
DATED this 23rd day of August, 2007.



HOOT CRAWFORD
Florida Bar No.: 0140521
748 Jenks Ave
Panama City, FL 32401
(850) 913-9661
ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Motion has been furnished by the undersigned counsel by U.S. Mail to Michael Sinacore, Assistant State's Attorney, 800 East Kennedy Boulevard, 3rd Floor, Tampa FL 33602 and Gina Jones c/o Benjamin Crump, 240 North Magnolia Drive, Tallahassee FL 32301; and to those persons set forth in the attached Additional Service List, this 23rd day of August, 2007.



HOOT CRAWFORD

ADDITIONAL SERVICE LIST

1. Ashley S. Benedik, Esquire
1004 Jenks Ave
Panama City FL 32401
2. James H. White, Jr., Esquire
229 McKenzie Ave
Panama City FL 32401
3. Jonathan Dingus, Esquire
527 Jenks Ave
Panama City FL 32401
4. Waylon Graham, Esquire
P.O. Box 327
Panama City FL 32402
5. Robert A. Pell, Esquire
P.O. Box 651
Panama City FL 32402
6. Walter B. Smith, Esquire
P.O. Box 580
Panama City FL 32402
7. Robert S. Sombathy, Esquire
P.O. Box 430
Panama City FL 32401

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**ORDER GRANTING MOTION TO ALLOW ISSUANCE
OF SUBPOENA DUCES TECUM WITHOUT DEPOSITION**

THIS CAUSE came on to be heard upon the Defendant's Motion to Allow Issuance Of Subpoena Duces Tecum Without Deposition, and the Court having heard argument of counsel, and the Court being otherwise fully advised in the premises, it is therefore

ORDERED AND ADJUDGED that the Clerk of this Court shall issue a subpoena duces tecum directed to the Clerk of Juvenile Court and the person responsible for the Court Smart audio recording system.

DONE AND ORDERED in chambers at Panama City, Bay County, Florida, this ___ day of August, 2007.

MICHAEL C. OVERSTREET, Circuit Judge

Copies furnished to:
Michael Sinacore
Hoot Crawford
Clerk of the Juvenile Court
Court Smart Clerk

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SUBPOENA DUCES TECUM WITHOUT DEPOSITION

THE STATE OF FLORIDA
COUNTY OF BAY

TO: CLERK OF THE JUVENILE COURT and COURT SMART RECORDING CLERK

YOU ARE COMMANDED to produce at the law offices of Hoot Crawford, 748 Jenks Ave, Panama City, Florida 32401, within ten (10) days from the date of service of this subpoena, the following:

1. A copy of any and all audio court proceedings or transcripts involving Martin Lee Anderson and any criminal charge(s) that were heard before the Court and/or charges that arose from incidents that occurred in 2005 or January 2006.

All items produced will be inspected and may be copied at that time. You will not be required to surrender the original items. **You may comply with this subpoena by providing**

legible copies of all items to be produced to the attorney whose name appears on this subpoena on or before the scheduled date of production. You may condition the preparation of the copies upon the payment in advance of the reasonable cost of preparation. You may mail or deliver the copies to the attorney whose name appears on this subpoena and thereby eliminate your appearance at the time and place specified above.

You have the right to object to the production pursuant to this subpoena at any time before the production by giving written notice to the attorney whose name appears on this subpoena.

If you fail to (1) appear as specified; or (2) furnish the records instead of appearing as provided above; or (3) object to this subpoena, you may be in contempt of court.

You are subpoenaed by the attorney whose name appears on this subpoena and, unless excused from this subpoena by the attorney or the Court, you shall respond to this subpoena as directed.

WITNESS my hand and official seal of this Court on the ___ day of August, 2007.

HOOT CRAWFORD
Florida Bar No.: 0140521
748 Jenks Ave
Panama City, FL 32401
(850) 913-9661
ATTORNEY FOR DEFENDANT

CLERK OF THE CIRCUIT COURT

By: _____
Deputy Clerk