

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

STATE OF FLORIDA

CASE NO.: 2012CF011572

vs.

MICHAEL DUNN

_____/

DEFENDANT'S MOTION TO CONTINUE

COMES NOW, the Defendant, **MICHAEL DUNN**, by and through undersigned counsel, and pursuant to Rule 3.190(g), Florida Rules of Criminal Procedure, files this Motion to Continue Jury Trial, and states the following as grounds:

1. This case is currently set for Jury Trial to begin on 3 February 2014, and is expected to take two to three weeks for said trial during the first few weeks of February, 2014.
2. The defendant is in custody and was denied pre-trial release.
3. The defendant is facing multiple punishable by life felonies in this case and undersigned counsel needs to ensure that all possible investigations into the facts of the case, the veracity of the State's witnesses, and the preparation for said jury trial is completed and has been exhaustive. The defendant and undersigned counsel are still in the process of preparing and finalizing the defense case for said jury trial, as well as other aspects of jury trial preparations necessary in this case.
4. Based on recent and multiple filings by the Intervener parties, including but not limited to the 1st DCA, said time necessary to properly research and respond to these multiple motions filed by the Intervener parties has greatly diminished the defendant's, through counsel, time to properly and effectively prepare said cause for jury trial currently scheduled to begin in two weeks.
5. Undersigned counsel has been in contact with the State Attorney's Office, who oppose this continuance request at the time of filing.

6. Accordingly, the defense, through undersigned counsel, would request that this case be reset for jury trial on the first trial period in April, 2014. The defendant previously waived his right to a speedy trial.

WHEREFORE, the Defendant, through undersigned counsel, prays this Court will issue its Order continuing the trial in this cause.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to the Office of the State Attorney, Duval County, 220 East Bay St., Jacksonville, Florida 32202, by Efile, Hand Delivery or Facsimile this January 17, 2014.

By: /s/ Cory Strolla
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