

IN THE CIRCUIT COURT OF THE SEVENTH  
JUDICIAL CIRCUIT IN AND FOR  
VOLUSIA COUNTY, FLORIDA

STATE OF FLORIDA,  
Plaintiff,

CASE NO: 642013CF102888A000XX  
JUDGE HUDSON

vs.

LUIS ALBERT TOLEDO,  
Defendant.

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**AMENDED MOTION TO COMPEL DISCOVERY**

**COMES NOW** the Defendant, **LUIS ALBERT TOLEDO**, by and through the undersigned attorney pursuant to Florida Rule of Criminal Procedure 3.220 and files this Motion to Compel and as grounds in support thereof would show unto the Court as follows:

1. The Defendant was arraigned in the above-noted matter on November 21, 2013.
2. The Office of Regional Conflict Counsel was appointed to represent the Defendant in the above-noted matter on December 12, 2013.
3. Undersigned counsel filed a Demand for Discovery on December 16, 2013.
4. Undersigned counsel's office called the State Attorney's Office on the following dates: January 2, 2014, January 6, 2014, January 7, 2014 and January 8, 2014.
5. Basic mandatory discovery pursuant to the rules of procedure has not been forwarded within fifteen days as required.
6. The material contains pertinent information to the charges either as the State intends to use this material as evidence at trial, or it contains exculpatory evidence which would be necessary to the defense.
7. The Defendant is in custody, basically solitary confinement and the State's delays are unlawful and prejudicial to the defense.

**WHEREFORE**, the Defendant asks this Honorable Court to grant his Motion to Compel.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that the foregoing has been furnished by U.S. MAIL delivery to:

The Office of State Attorney, Volusia County, Florida, willj@sao7.org this \_\_\_\_\_ day  
of January 2014.



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**JEFFREY D. DEEN, ESQ.**

Fla. Bar no. 0457574

Regional Counsel

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