

IN THE CIRCUIT COURT OF THE
NINTH JUDICIAL CIRCUIT IN AND
FOR ORANGE COUNTY, FLORIDA

CASE NO.: 08-CA-24573

ZENAIDA GONZALEZ,

Plaintiff,

vs.

CASEY ANTHONY,

Defendant.

EMERGENCY MOTION TO COMPEL
APPEARANCE AT VIDEOTAPE DEPOSITION

COMES NOW the Plaintiff, ZENAIDA GONZALEZ, by and through the undersigned counsel, and moves the Court for an Order compelling Defendant, CASEY ANTHONY, to appear and give testimony and would show unto the Court the following:

1. The videotape deposition of Defendant, CASEY ANTHONY, is currently scheduled for July 19, 2011 at 10:00 a.m. at the offices of Morgan & Morgan, P.A., 20 N. Orange Avenue, 16th Floor, Orlando, Florida 32801.
2. The Defendant, CASEY ANTHONY, was individually served with a Subpoena for Videotape Deposition as documented by the attached Affidavit of Service marked as Exhibit "A".
3. Counsel for Defendant, CASEY ANTHONY, was also served with a copy of said Subpoena for Videotape Deposition, as documented by the attached Affidavit of Services, marked as Exhibit "B".
4. A copy of the Notice of Taking Videotape Deposition previously filed with the Court is attached and marked as Exhibit "C".

5. In the alternative, the undersigned is willing to take the deposition of the Defendant, CASEY ANTHONY, prior to her release on July 17, 2011 at the Female Detention Center in Orlando, Florida.

6. The undersigned has a good faith basis to believe that the Defendant, CASEY ANTHONY, will leave the jurisdiction of this Court, disguise herself, change her name, etc., making it impossible to ever depose her. It has been widely reported in the news media that she will leave the jurisdiction following her release on Sunday, July 17, 2011.

7. It is imperative that Plaintiff take the Defendant's deposition.

8. It is requested that this Court compel the deposition of the Defendant, CASEY ANTHONY, either as scheduled on July 19, 2011 or in the alternative prior to her release from jail.

WHEREFORE, the Plaintiff requests that this Court enter an Order compelling Defendant, CASEY ANTHONY, to appear for the taking of her videotape deposition.

CERTIFICATE OF GOOD FAITH

The undersigned has contacted defense counsel in an effort to resolve this issue and defense counsel does not agree to the relief sought.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 13, 2011, I electronically filed the foregoing with the Clerk of the Courts by using the ECF system which will send a notice of electronic filing to the following: Charles M. Greene, Esquire, Law Offices of Charles M. Greene, P.A., 28 E. Washington Street, Orlando, FL 32801.



JOHN B. MORGAN, ESQUIRE

Florida Bar No.: 0399116

KEITH R. MITNIK, ESQUIRE

Florida Bar No.: 436127

JOHN W. DILL, ESQUIRE

Florida Bar No.: 981680

Morgan & Morgan, P.A.

P. O. Box 4979

Orlando, FL 32802-4979

Telephone: 407-420-1414

Facsimile: 407-425-8171

Attorneys for Plaintiff

AFFIDAVIT OF SERVICE

State of Florida

County of Orange

Circuit Court

Case Number: 08-CA-24573 Court Date: 7/19/2011 10:00 am

Plaintiff:

Zenaida Gonzalez

vs.

Defendant:

Casey Anthony

For:

Keith R. Mitnik, Esquire
Morgan & Morgan, P.A.
20 N. Orange Ave.
Suite 1600
Orlando, FL 32801

Received by Investigative Process Service, Inc. on the 5th day of July, 2011 at 4:17 pm to be served on **Casey Marie Anthony, c/o: Charles M. Greene, Esquire, 28 East Washington Street, Orlando, FL 32801.**

I, Travis Foster, being duly sworn, depose and say that on the **5th day of July, 2011 at 7:47 pm, I:**

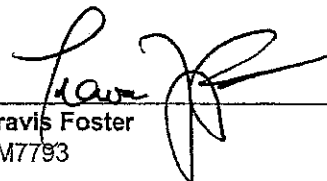
INDIVIDUALLY SERVED: Served the within named person by delivering a true copy of this **Subpoena for Videotape Deposition** with the date and hour of service endorsed thereon by me, pursuant to F.S. 48.031(1).

Additional Information pertaining to this Service:

Served at the Orange County Jail, 3723 Vision Boulevard, Orlando, FL 32839.

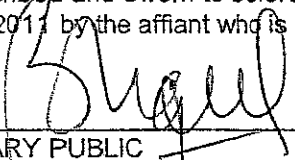
Description of Person Served: Age: 25, Sex: F, Race/Skin Color: White, Height: 5'2", Weight: 110, Hair: Brown, Glasses: N

I certify that I am over the age of eighteen, and I have no interest in the above action.




Travis Foster
#M7793

Subscribed and Sworn to before me on the 6th day of July, 2011 by the affiant who is personally known to me.



NOTARY PUBLIC

 **BARBARA ROCQUE**
MY COMMISSION # DD 051927
EXPIRES: January 30, 2013
Bonded Thru Budget Notary Services

Investigative Process Service, Inc.
P. O. Box 3551
Orlando, FL 32802-3551
(407) 426-7433

Our Job Serial Number: ILS-2011011066

Service Fee: _____

RUSH

IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT
IN AND FOR ORANGE COUNTY, FLORIDA

ZENAIDA GONZALEZ,

CASE NO.: 08-CA-24573

Plaintiff,

vs.

CASEY ANTHONY,

Defendant.

SUBPOENA FOR VIDEOTAPE DEPOSITION

THE STATE OF FLORIDA

TO: Casey Marie Anthony
c/o Charles M. Greene, Esquire
Law Offices of Charles M. Green, P.A.
28 E. Washington Street
Orlando, FL 32801

*You must obtain description
of the person served!*

YOU ARE COMMANDED to appear before a person authorized by law to take videotape depositions at the offices of Morgan & Morgan, P.A., 20 North Orange Avenue, 20 North Orange Avenue, 16th Floor Courtroom, Orlando, Florida 32801, on Tuesday, July 19, 2011, at 10:00 a.m., for the taking of your videotaped deposition in this action. If you fail to appear, you may be in contempt of Court.

You are subpoenaed by the following attorney and unless excused from this Subpoena by this attorney or the Court, you shall respond to this subpoena as directed.

DATED this 5 day of July, 2011.

1066

Served 3
Date 7/5/11 Time 7:47P
Linda J. Moran

Sandra K. Eisenberg — Ed Young
Twanda Long — Travis Foster
Nancy J. Harris — Diane Chermak
Erica Austin — Khalid Faigy

SPECIAL & CERTIFIED PROCESS SERVER

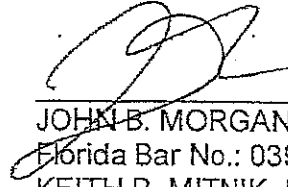
18th # OR # OS #
Investigative Process Service, Inc.
390 N. Orange Ave., Suite 1650
Orlando, FL 32801 ★ 407-426-7433

RUSH

You must obtain description
of the person served!

Age ~~20~~ 25, Sex M F, Race W
Height 5'2, Weight 110
Hair B, Glasses Y N

FOR THE COURT.



JOHN B. MORGAN, ESQUIRE

Florida Bar No.: 0399116

KEITH R. MITNIK, ESQUIRE

Florida Bar No.: 436127

JOHN W. DILL, ESQUIRE

Florida Bar No.: 981680

Morgan & Morgan, P.A.

P. O. Box 4979

Orlando, FL 32802-4979

Telephone: 407-420-1414

Facsimile: 407-425-8171

Attorneys for Plaintiff

In accordance with the Americans With Disability Act, if you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact Court Administrator at 425 North Orange Avenue, Orlando, Florida 32801, telephone (407) 836-2203 within two (2) working days of your receipt of this subpoena, if you are hearing or voice impaired, call 1-800-935-8771.

AFFIDAVIT OF SERVICE

State of Florida

County of Orange

Circuit Court

Case Number: 08-CA-24573 Court Date: 7/19/2011 10:00 am

Plaintiff:

Zenaida Gonzalez

vs.

Defendant:

Casey Anthony

For:

Keith R. Mitnik, Esquire

Morgan & Morgan, P.A.

20 N. Orange Ave.

Suite 1600

Orlando, FL 32801

Received by Investigative Process Service, Inc. on the 5th day of July, 2011 at 4:17 pm to be served on **Casey Marie Anthony, c/o: Charles M. Greene, Esquire, 28 East Washington Street, Orlando, FL 32801.**

I, Nicole Leftwich, being duly sworn, depose and say that on the **6th day of July, 2011 at 11:25 am, I:**

I served the **Subpoena for Videotape Deposition** as listed below in comments.

Additional Information pertaining to this Service:

Per instructions from client, we were to deliver a courtesy copy of the Subpoena for Videotape Deposition to the above referenced attorney (Charles M. Greene). The receptionist telephoned a woman in the office to accept service and they informed me that they were aware that the subpoena had been served the previous evening on the defendant. The receptionist again asked for permission from office staff to take the subpoena and she was informed that I could leave the subpoena as long as they did not have to sign for it. I left the subpoena with the receptionist.

Description of Person Served: Age: 28, Sex: F, Race/Skin Color: Hispanic, Height: -, Weight: 220, Hair: Black, Glasses: N

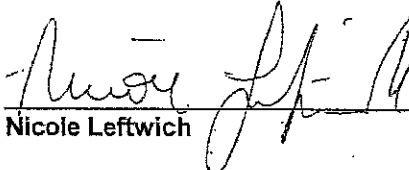
I certify that I am over the age of eighteen, and I have no interest in the above action.

Subscribed and Sworn to before me on the 6th day of July, 2011 by the affiant who is personally known to me.

NOTARY PUBLIC



BARBARA ROGUE
MY COMMISSION # DD 851927
EXPIRES: January 30, 2013
Bonded Thru Budget Notary Services



Nicole Leftwich

Investigative Process Service, Inc.
P. O. Box 3551
Orlando, FL 32802-3551
(407) 426-7433

Our Job Serial Number: ILS-2011011064

Service Fee: \$60.00

RUSH

IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT
IN AND FOR ORANGE COUNTY, FLORIDA

ZENAIDA GONZALEZ,

CASE NO.: 08-CA-24573

Plaintiff,

vs.

CASEY ANTHONY,

Defendant.

SUBPOENA FOR VIDEOTAPE DEPOSITION

THE STATE OF FLORIDA

TO: Casey Marie Anthony
c/o Charles M. Greene, Esquire
Law Offices of Charles M. Green, P.A.
28 E. Washington Street
Orlando, FL 32801

You must obtain description
of the person served!

YOU ARE COMMANDED to appear before a person authorized by law to take videotape depositions at the offices of Morgan & Morgan, P.A., 20 North Orange Avenue, 20 North Orange Avenue, 16th Floor Courtroom, Orlando, Florida 32801, on Tuesday, July 19, 2011, at 10:00 a.m., for the taking of your videotaped deposition in this action. **If you fail to appear, you may be in contempt of Court.**

You are subpoenaed by the following attorney and unless excused from this Subpoena by this attorney or the Court, you shall respond to this subpoena as directed.

DATED this 5 day of July, 2011.

1064

mandy

RUSH

Served _____
Date 7-6-2011 Time 11:30 AM

- Bandra K. Eisenberg — Ed Young
- Wanda Long — Travis Foster
- Nancy J. Harris — Diane Chermak
- Erica Austin — Khalid Faigy

SPECIAL & CERTIFIED PROCESS SERVER
ISEP # _____ IOS # 4

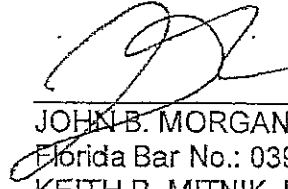
Investigative Process Service, Inc.
330 N. Orange Ave., Suite 1650
Orlando, FL 32801 * 407-425-7433

Nicole Leftwich

You must obtain description
of the person served!

Age 28, Sex M F Race S
 Height _____, Weight 220
 Hair Black, Glasses Y N

FOR THE COURT.



JOHN B. MORGAN, ESQUIRE

Florida Bar No.: 0399116

KEITH R. MITNIK, ESQUIRE

Florida Bar No.: 436127

JOHN W. DILL, ESQUIRE

Florida Bar No.: 981680

Morgan & Morgan, P.A.

P. O. Box 4979

Orlando, FL 32802-4979

Telephone: 407-420-1414

Facsimile: 407-425-8171

Attorneys for Plaintiff

In accordance with the Americans With Disability Act, if you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact Court Administration at 425 North Orange Avenue, Orlando, Florida 32801, telephone (407) 836-2303 within two (2) working days of your receipt of this subpoena if you are hearing or voice impaired, call 1-800-955-8771.

IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT
IN AND FOR ORANGE COUNTY, FLORIDA

ZENAIDA GONZALEZ,

CASE NO.: 08-CA-24573

Plaintiff,

vs.

CASEY ANTHONY,

Defendant.

NOTICE OF TAKING VIDEOTAPE DEPOSITION

PLEASE TAKE NOTICE that Plaintiff, ZENAIDA GONZALEZ, will take the videotape deposition of the following person at the time and place set forth hereinafter before a Notary Public, or any other officer duly authorized by law to take videotape depositions and administer oaths.

<u>Deponent</u>	<u>Date</u>	<u>Time</u>
Casey Marie Anthony	July 19, 2011	10:00 a.m.

PLACE OF DEPOSITION: Morgan & Morgan, P.A.
20 North Orange Avenue, 16th Floor
Orlando, FL 32801
(407) 420-1414

The oral examination will continue from day-to-day until complete. Said deposition is being taken for discovery, for use at trial, or both for such other purposes permitted under the Florida Rules of Civil Procedure and all applicable statutes without limitation.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 6, 2011, I electronically filed the foregoing with the Clerk of the Courts by using the ECF system which will send a notice of electronic

filing to the following: Charles M. Greene, Esquire, Law Offices of Charles M. Greene,
P.A., 28 E. Washington Street, Orlando, FL 32801.

s/JOHN W. DILL

JOHN B. MORGAN, ESQUIRE

Florida Bar No.: 0399116

KEITH R. MITNIK, ESQUIRE

Florida Bar No.: 436127

JOHN W. DILL, ESQUIRE

Florida Bar No.: 981680

Morgan & Morgan, P.A.

P. O. Box 4979

Orlando, FL 32802-4979

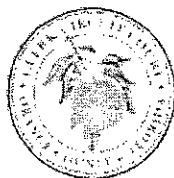
Telephone: 407-420-1414

Facsimile: 407-425-8171

Attorneys for Plaintiff

cc: Central Florida Reporters

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***** IMPORTANT NOTICE - READ THIS INFORMATION *****

NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2008-CA-024573-O
Judge: Rodriguez, Jose R - Div 33

Official File Stamp: 07-06-2011:13:54:42
Court: Orange County Clerk of Courts
Circuit Civil
201
Case Title: FERNANDEZ-GONZALEZ, ZENAIDA vs. ANTHONY, CASEY
Document(s) Filed: NOTICE OF TAKING DEPOSITION VIDEOTAPE DEPOSITION
Filed In Behalf Of: John Dill

You may review this filing in the Document Management system located on the Internet at <http://www.myorangeclerk.com> or click on the following link to take you to your cases.

This notice was automatically generated by the courts auto-notification system.

The following people were notified electronically:

MORGAN, JOHN BRYAN ESQ for FERNANDEZ-GONZALEZ, ZENAIDA
DILL, JOHN ESQ for FERNANDEZ-GONZALEZ, ZENAIDA
GREENE, CHARLES M ESQ for ANTHONY, CASEY
MITNIK, KEITH R ESQ for FERNANDEZ-GONZALEZ, ZENAIDA
CROWELL, TOMASITA D ESQ for ANTHONY, CASEY
Rodriguez, Jose R

The following people need to be notified:

KASEN, JONATHAN ESQ for ANTHONY, CASEY
CONVERSION