

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA

STATE OF FLORIDA

CASE NO.: 52-2023CF002935-000APC

v.

TOMASZ KOSOWSKI,
Defendant.

_____/

**Notice of Confidential Information within Court Filing/Motion for
Determination of Confidentiality and Request to Seal *Ex Parte* Motion to
Authorize Due Process Costs #1 and Any Subsequent Order**

The Defendant, TOMASZ KOSOWSKI, hereby files this *Notice of Confidential Information within Court Filing/Motion for Determination of Confidentiality and Request to Seal Ex-Parte Motion for Due Process Costs #1 and Any Subsequent Order*, and moves the Court pursuant to Florida Rule of General Practice & Judicial Administration 2.420 (c)(9) for an order determining the confidentiality of court records, and for an order sealing the same.

1. The movant seeks an order sealing the following information in this criminal case: *Defendant's Confidential and Sealed Ex Parte Motion to Authorize Due Process Costs #1* and **any order** on this Motion.

2. The **entire document** - *Defendant's Confidential and Sealed Ex Parte Motion to Authorize Due Process Costs #1* - is **confidential**. The entirety of any **order** on *Defendant's Confidential and Sealed Ex Parte Motion to Authorize Due Process Costs #1* is **confidential**.

3. Pursuant to Florida Rules of Judicial Administration 2.420 (c)(9) and *Andrews v. State*, 243 So. 3d 899 (Fla. 2018), the court records should be considered confidential. The documents contain privileged information under the Sixth Amendment and should be sealed as the State does not have a right to access the Defendant's due process cost motions.

4. Confidentiality of the documents sought to be sealed is required to protect the following interests:

- a. Obtaining evidence to determine the legal issues in a case;
- b. Protecting work product and/or attorney client privilege;
- c. Complying with the established public policy set forth in the Florida or United States Constitution, specifically: United States Constitution Amendment VI, Florida Constitution Article I Section 16, and Florida Rules of Criminal Procedure Rule 3.220.

5. There is no less restrictive measure available to protect these interests, and the degree, duration and manner of confidentiality ordered herein are no broader than necessary to protect the interests.

Wherefore, the undersigned requests that the Court enter an Order finding that the following listed documents are confidential, sealing the documents, and ordering that the documents are not to be accessible to the public and the parties:

1. *Defendant's Confidential and Sealed Ex Parte Motion to Authorize Due Process Costs # 1*, and
2. Any Order on *Defendant's Confidential and Sealed Ex Parte Motion to Authorize Due Process Costs # 1*

The file and progress docket shall otherwise remain available to the public. However, the **progress docket should only identify the documents sealed as *ex parte* motion, and *ex parte* order.**

I certify that this Motion is made in good faith and is supported by a sound factual and legal basis.

Respectfully submitted July 29, 2026

/s/ Jane A. McNeill
Jane A. McNeill, B.C.S

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to the Office of the State Attorney via eservice on July 29, 2026.

/s/ Jane A. McNeill
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