

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

STATE OF FLORIDA

23-02935-CF

v.

CAPITAL MURDER

TOMASZ ROMAN KOSOWSKI /

MOTION TO CONTINUE TRIAL

Defendant, TOMASZ ROMAN KOSOWSKI, by and through his undersigned counsel, hereby files this Motion to Continue Trial and Incorporated Memorandum of Law and moves this Honorable Court to enter an order continuing the trial herein, and as grounds therefore, states as follows:

1. Defendant was indicted for First Degree Capital Murder, on or about April 27, 2023.
2. On or about April 28, 2023, the Office of the State Attorney filed the notice of intent to seek the death penalty.
3. Discovery is voluminous and not complete.
4. Counsel has diligently conducted depositions and investigated potential evidence; however, counsel does not believe that this case can be ready and prepared for the current trial date of January 27, 2025.
5. Furthermore, lead counsel has been scheduled for a month long jury trial in Federal Court in New Jersey for the entire month of January 2025.
6. For the reasons set forth above, undersigned counsel is requesting to continue

the trial.

WHEREFORE, Defendant asks the Court to enter an Order continuing the trial to more realistic trial date to insure effective representation.

CERTIFICATE OF GOOD FAITH

Counsel hereby certifies that this motion is made in good faith and not for purposes of unnecessary delay.

Respectfully submitted,

s/Bjorn E. Brunvand
BJORN E. BRUNVAND, ESQ.
BRUNVAND WISE, P.A.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished electronically to the Office of the State Attorney, this 17th day of February 2024.

s/Bjorn E. Brunvand
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