

**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 COMPEL DISCOVERY # 6

Defendant, TOMASZ ROMAN KOSOWSKI, by and through undersigned counsel, and pursuant to Rule 3.220(n), Florida Rules of Criminal Procedure, requests this Court to enter an Order compelling the State of Florida to comply with the various rules of discovery outlined in Rule 3.220. As grounds for this Motion, Defendant states as follows:

1. Defendant is charged via indictment with First-Degree Murder and the State of Florida has filed a notice of intent to seek the death penalty.
2. Undersigned counsel filed a notice of appearance and demand for discovery on March 26, 2023.
3. The State has provided voluminous discovery on the following dates:
 - a) May 12th 2023;
 - b) November 9th 2023; and
 - c) December 5th 2023.
4. On several occasions, counsel has requested via email, the production of the following additional discovery that has not yet been provided:

5. Any and all information between SAO investigators and/or Largo P.D. and T-Mobile as it relates to obtaining potential evidence via subpoena, requests or warrants.

Wherefore, based on the forgoing, Defendant moves this court to enter its order compelling the prompt production of said discovery.

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 26th day of February 2024.

s/Bjorn E. Brunvand
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