

IN THE CIRCUIT COURT OF THE SIXTH  
JUDICIAL CIRCUIT, IN AND FOR  
PINELLAS COUNTY, FLORIDA.  
CASE NO.: 2023-02935-CF

STATE OF FLORIDA,

v.

TOMASZ KOSOWSKI,  
Defendant.

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**MOTION TO WITHDRAW**

COMES NOW, Tania Alavi, the undersigned counsel, hereby files this Motion to Withdraw and requests that this Court issue an Order releasing her from further representation in this case. In support of this Motion, the undersigned states the following:

1. The Defendant is charged with murder in the first degree in the above-styled case.
2. The undersigned was appointed to represent the Defendant on or about June 10, 2025, in the above-styled case.
3. The following is the undersigned's schedule in the coming months:
  - a. The undersigned is out of state beginning June 11, 2025, through June 20, 2025.
  - b. The undersigned has a penalty phase trial scheduled before this Court beginning July 14, 2025, for two weeks.
  - c. The undersigned has a three-week penalty phase trial in Duval County scheduled to begin August 18, 2025.
  - d. The undersigned has a home invasion robbery trial in Marion County scheduled to begin September 8, 2025.
  - e. The undersigned is out of the office for Christmas beginning December 22, 2025, through January 2, 2026.
  - f. The undersigned has a penalty phase trial in Orange County scheduled to begin January 12, 2026.
4. The undersigned has approximately eight death penalty cases and one federal pre-indictment death penalty case currently pending.

5. Based on the foregoing, it is in the best interest of this Defendant that he be appointed another attorney on the registry designated to handle such cases.
6. The undersigned emailed the state, Nathan Vonderheide, on Thursday June 12, 2025, to see if the state had any objection to this motion, however as of the filing of this motion, the undersigned has not received a response.

WHEREFORE, Tania Alavi, respectfully requests that this Court enter an Order granting the Motion to Withdraw from further representation of this Defendant in the above-styled case.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to the Office of State Attorney via eservice/U.S. Mail delivery on June 16, 2025.

**ALAVI & POZZUTO, P.A.**

/s/ Tania Z. Alavi  
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