

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

STATE OF FLORIDA

Case No. 23-CF-03157

v.

Division: K

THOMAS MOSLEY

_____ /

**DEFENDANT'S MOTION FOR MRI SCAN, PET SCAN AND TRANSPORTATION BY
THE PINELLAS COUNTY SHERIFF'S OFFICE**

Defendant, Thomas Mosley ("Mosley"), by and through undersigned counsel, moves this Honorable Court to enter an Order requiring the Pinellas County Sheriff's Office to transport Thomas Mosley to a medical/imaging facility and back for the purposes of performing Magnetic Resonance Imaging and Positron Emission Tomography upon Thomas Mosley, and as grounds states as follows:

1. Mr. Mosley is charged with two counts of Murder in the First Degree and the State is seeking the death penalty.
2. Counsel has reasonable grounds to believe that the testing is essential in order to properly prepare for both the guilt and penalty phase.
3. An expert will be retained by the defense and it is believed that an MRI, MRI-DTI, and PET Scan of Mr. Mosley's brain are necessary to complete a comprehensive examination and evaluation of Defendant for the penalty phase.
4. Failure to grant the motion would be a violation of the Due Process Clause of the United States Constitution as well as Amendments IV, V and XIV of the United States Constitution, Art. 1, Sections 2, 9, 16, 17, 21 and 23 of the Florida Constitution and would be a violation of the discovery rules in the Florida Rules of Criminal Procedure.

WHEREFORE, Thomas Mosley respectfully requests this Honorable Court to enter an Order requiring the Pinellas County Sheriff's Office to transport Thomas Mosley for the purposes of performing Magnetic Resonance Imaging and Positron Emission Tomography upon Thomas Mosley and to ensure that the jail complies with any medical requirements to ensure a valid MRI and PET scan.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing has been furnished to the Office of the State Attorney, Clearwater, FL and the Pinellas County Sheriff's Office on July 17, 2026.

/s/ Justin Petredis

Justin Petredis, Esq.
Florida Bar Number: 905461, For
REGIONAL COUNSEL, SECOND DISTRICT
601 N. Ashley St.
Tampa, FL 33602
Phone: (813) 294-4319