

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

STATE OF FLORIDA

vs.

Case No.(s): 23-03157-CF

THOMAS ISAIAH MOSLEY

Division: SECTION K

Defendant  
\_\_\_\_\_ /

**MOTION TO APPOINT EXPERTS TO DETERMINE THE DEFENDANT'S  
MENTAL CONDITION WITH RESPECT TO COMPETENCY  
AND CERTIFICATE OF GOOD FAITH**

---

COMES NOW the Public Defender for the Sixth Judicial Circuit, by and through the undersigned, to move this Court, pursuant to Fla. R. Crim P. R. 3.210(b), for an Order Appointing Expert(s) to Determine the Defendant's Mental Condition with Respect to the Issue of Competency. In support of this motion, to the extent that it does not invade the lawyer-client privilege, the undersigned submits the following specific observations of the Defendant which formed the basis for this motion and reasonable grounds to believe that the Defendant is not competent:

1. Defense experts have opined that Mr. Mosley is incompetent and their reports have been filed under seal.

WHEREFORE, the undersigned respectfully requests this motion to appoint experts to examine the Defendant be granted.


**CERTIFICATE OF GOOD FAITH**

I HEREBY CERTIFY to this Court that the Motion to Appoint Experts for a Competency Evaluation is made in good faith and with reasonable grounds to believe that the above-named Defendant is incompetent to proceed with any material stage of the proceeding.

**CERTIFICATE OF SERVICE**

I do certify that a copy hereof has been furnished by email/physical delivery to the State Attorney, County Justice Center, Clearwater, Florida, on July 21, 2023.

Respectfully submitted,  
Sara Mollo  
Public Defender for the  
Sixth Judicial Circuit  
By:

  
\_\_\_\_\_  
Jessica Manuele  
Assistant Public Defender  
Florida Bar No.: 72720, 48778, 88262  
County Justice Center  
14250 49th Street North  
Clearwater, Fl 33762  
Pubdef-efiling@co.pinellas.fl.us  
(727) 464-6516