

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

STATE OF FLORIDA,

Plaintiff,

v.

THOMAS ISAIAH MOSLEY,

Defendant.

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CASE NO: 2023-CF-003157

JUDGE: SUSAN ST. JOHN

**MOTION TO ALLOW AUDIO-VIDEO COMMUNICATION TECHNOLOGY  
FOR TESTIMONY OF WITNESS**

A witness in this matter, Dr. Theresa Ascheman Jones of South Florida Evaluation and Treatment Center (SFETC), by and through the undersigned counsel, pursuant to Fla. R. Gen. prac. Jud. Admin. 2.530, moves this Honorable Court for an Order to allow Dr. Asheman Jones to testify remotely using audio-video communication technology, and as grounds states the following:

1. The Office of the State Attorney issued a subpoena to Dr. Aschman Jones to testify in-person as a witness in a competency hearing in the above-referenced matter set for Friday, March 22, 2024, at 130pm at the Pinellas County Justice Center. See attached.
2. Dr. Ascheman Jones authored a report opining the defendant competent to proceed on or about January 12, 2024, and the defendant was discharged from SFETC on or about February 1, 2024.
3. Dr. Ascheman Jones both resides and works well over 300 miles away from the Pinellas County Justice Center.
4. The undersigned attorney asked the Assistant State Attorney (ASA) to allow Dr.

Ascheman Jones to testify using audio-video communication technology. The ASA responded that the Assistant Public Defenders (APDs) most likely will not allow Dr. Ascheman Jones to testify via video conferencing.

5. The undersigned contacted APDs Jessica Manuele and Margaret Russell, but as of this filing of the instant motion - a final decision regarding testimony by video conferencing has not been conveyed to the undersigned.
6. Dr. Ascheman Jones would have to take an inordinate amount of time out of her schedule to travel a full day to Pinellas County, rent a hotel room, and then appear in-person at the hearing on the afternoon of March 22nd.
7. Dr. Ascheman Jones has a large workload and treats numerous mentally ill patients every day on a set schedule involving several different treatment teams.
8. To be away from her patients for over a full work day would jeopardize her patients' treatment schedules and would be extremely inconvenient for both Dr. Ascheman Jones and her patients, to say the least.
9. Although the ASA and the APDs may object to this motion, under Fla. R. Gen. prac. Jud. Admin. 2.530, "the decision to authorize the use of communication technology over objection shall be in the discretion of the court official."

WHEREFORE, Dr. Ascheman Jones respectfully requests this Honorable Court to enter an Order allowing her to testify remotely by audio-video communication for any hearings in this matter.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by the Florida Courts E-Filing Portal to Assistant State Attorney Courtney Sullivan at [eservice@flsa6.gov](mailto:eservice@flsa6.gov) and to Assistant Public Defenders Jessica Manuele and Margaret Russell at [jessicamanuele@flpd6.gov](mailto:jessicamanuele@flpd6.gov) and [margaretrussell@co.pinellas.fl.us](mailto:margaretrussell@co.pinellas.fl.us), respectively, on this 28th

day of February, 2024.

Respectfully submitted,

Wellpath, LLC  
South Florida Evaluation and Treatment Center  
18680 SW 376th Street  
Florida City, FL 33034  
voice - 786-349-6005  
email - *matthew@larrysdavislaw.com*  
*courtdocs@larrysdavislaw.com*

/s/ Matthew T Hatfield  
Matthew T. Hatfield, Esq.  
Florida Bar Number 83384

WITNESS SUBPOENA – CRIMINAL

24008098

CIRCUIT COURT, PINELLAS COUNTY, FLORIDA

**HANDSERVE**

STATE OF FLORIDA

CASE NO: 23-03157-CF

vs

LAB NO:

THOMAS ISAIAH MOSLEY  
3322179

OFFENSE NO: 23012060  
AGENCY: ST PETERSBURG POLICE DEPT

**SUBPOENA TO APPEAR FOR COMPETENCY HEARING**

THE STATE OF FLORIDA TO ALL AND SINGULAR THE SHERIFFS, STATE ATTORNEY INVESTIGATORS,  
AND AGENTS OF THE FLORIDA DEPARTMENT OF LAW ENFORCEMENT.

YOU ARE HEREBY COMMANDED TO SUBPOENA:

THERESA ASCHEMAN JONES  
SOUTH FLA EVALUATION TREATMENT CENTER  
18680 SW 376TH ST  
FLORIDA CITY FL 33034

UPON RECEIPT OF THIS SUBPOENA, YOU ARE REQUIRED TO CALL THE  
VICTIM WITNESS MANAGEMENT TEAM AT (727) 464-6090

TO BE AND APPEAR BEFORE THE COURT, ON MARCH 22, 2024 AT 1:30PM, ROOM 1000, 14250 49TH  
STREET NORTH, CLEARWATER, FL.

**PATIENT NAME: THOMAS MOSLEY, DOB: 3/29/2002, M/B**


To testify in the above-styled cause. APPROPRIATE ATTIRE REQUIRED.

NOTE: You are subpoenaed to appear by BRUCE BARTLETT, STATE ATTORNEY, and unless excused from this  
subpoena by this attorney or the Court, you shall respond to this subpoena as directed. If you fail to appear, you may be  
held in contempt of Court. THIS SUBPOENA IS IN EFFECT FOR THE DURATION OF THE TRIAL OR HEARING.

WITNESS, KEN BURKE,  
As Clerk of the Circuit Court, and the seal of said  
Court, at the Courthouse, Clearwater, Florida.

February 15, 2024



  
KEN BURKE, CPA  
CLERK OF THE CIRCUIT COURT  
& COMPTROLLER

SAX: Tami Raddock  
ASA: Courtney Sullivan

**If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact the Human Rights Office, 400 S. Ft. Harrison Ave., 5<sup>th</sup> Floor, Clearwater FL 33756, (727) 464-4062 (V/TDD), at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.**