

IN THE CIRCUIT COURT FOR PINELLAS COUNTY, FLORIDA  
23-03157-CF  
SECTION K

STATE OF FLORIDA

vs.

THOMAS ISAAH MOSLEY Person ID: 3322179

MOTION TO COMPEL DISCLOSURE OF WHODAS 2.0 SCORESHEETS

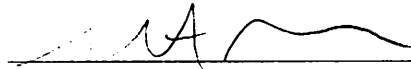
The Defendant, by and through undersigned counsel, respectfully requests this Honorable Court order the disclosure to counsel of the WHODAS 2.0 scoresheets administered to Thomas and Renee Mosley by Dr. Michael Railey. The grounds for this motion are:

1. Dr. Michael Railey administered a disability questionnaire called the WHODAS 2.0 to Thomas and Renee Mosley. The scoresheets of both tests, which are simple recorded answers rating Thomas' abilities on certain tasks, were provided to defense experts.
2. There are discrepancies concerning the source of the data included on the scoresheets and the date the scoring was completed.
3. The WHODAS 2.0 is an open-source disability assessment. Both the test and manual are available on the internet.
4. The Court should order the release of the scoresheets to counsel because they are not proprietary.
5. Mr. Mosley's counsel must review the scoresheets to effectively cross-examine Dr. Railey on his methods of test administration to preserve Mr. Mosley's rights to due process and confrontation.
6. Since Mr. Mosley is subject to the death penalty, the scoresheets should also be admissible into evidence in the record in this case for purposes of preserving a full record on appeal, subject to proper authentication.

NOTICE OF HEARING

YOU ARE NOTIFIED that the above will be heard before the Honorable Susan St. John, County Justice Center, 14250 49th Street North, Clearwater, FL 33762, on **June 26, 2025**, at **12:30 p.m.**

I do certify that a copy hereof has been furnished by email/physical delivery to the State Attorney, County Justice Center, Clearwater, Florida, on June 26, 2025.



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