

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

STATE OF FLORIDA

v.

CASE NO.: 25-06211-CF
UCN: 522025CF006211000APC

JEFFRY DAVID KNIGHT /

**DEFENDANT'S MOTION TO DEFER FURTHER PRETRIAL CONFERENCES,
WAIVER OF SPEEDY TRIAL PURSUANT TO FLA. R. CRIM. P. 3.191,
AND REQUEST FOR TRIAL PERIOD**

Defendant, by and through undersigned counsel, files this Motion for consideration at the Pretrial Conference scheduled for January 12, 2027, and respectfully requests that the Court defer further routine pretrial conferences until February 2027, accept Defendant's waiver of speedy trial pursuant to Florida Rule of Criminal Procedure 3.191, and set this matter for a trial period commencing no sooner than August 2027, or calendar call consistent with the Court's procedures. In support, Defendant states:

1. The case is presently set for Pretrial Conference on January 12, 2026. Defendant files this motion for consideration at that setting.
2. This case is not presently set for trial. However, at the last Pretrial Conference, held on October 27, 2025, the Court indicated a desire to see this matter tried sometime around April or May of 2026.
3. The defense seeks a realistic and meaningful schedule that corresponds to the substantial work required to reach genuine trial readiness, including completion of depositions, organization and review of voluminous discovery, receipt of a critical federal investigative report, and extensive expert analysis. This is an exceptionally complex prosecution involving technical, factual, and expert-driven issues, and it cannot be responsibly prepared on an accelerated timeline.
4. Good cause exists to defer further routine pretrial conferences until February 2027 because, given the current posture of the case, additional interim conferences before then are unlikely to materially advance trial readiness. Repeated settings during an incomplete discovery phase risk creating the appearance of readiness where none yet exists and consume judicial resources without meaningful progress.

5. The Information alleges multiple groups of counts arising from a single incident, including counts alleging leaving the scene, excessive speed, and failure to maintain a proper lookout.
6. The scoresheet prepared by the State reflects a lowest permissible sentence exceeding twenty-three (23) years in state prison. Given the Defendant's age, this exposure is effectively a life sentence. When the State seeks punishment of this magnitude, the defense must be afforded sufficient time to investigate, analyze, and prepare with the utmost care.
7. The defense is mindful of its professional obligations under the Rules Regulating the Florida Bar, including Rule 4-1.1, which requires competent representation. Competent representation includes appropriate inquiry into and analysis of the factual and legal elements of the case and adequate preparation using methods and procedures meeting the standards of competent practitioners. The rule provides that reasonable preparation depends on the complexity of the case and the severity of the potential sentence. Here, the stakes could not be higher.
8. Crucially, a central component of the investigation remains outstanding. Neither the defense nor the State has yet received the United States Coast Guard investigative report, which has been delayed, at least in part, due to a recent federal shutdown. This report is foundational to the defense and is not merely cumulative or collateral discovery.
9. The defense reasonably anticipates that this comprehensive report will address issues central to the allegations, including operational conditions in the channel, visibility and lighting conditions, the conduct and decisions of the commercial vessel's crew, and regulatory or safety findings.
10. The report is expected to bear directly on disputed issues such as whether the Defendant's speed was "excessive" under the circumstances and whether a reasonable lookout would have been able to detect an unlit commercial vessel in a dark channel in time to avoid the incident. The defense must also provide the report to retained experts, including a crash reconstruction expert and a maritime operations expert, for analysis and potential testimony.
11. The defense cannot reasonably conduct informed depositions of essential witnesses until the Coast Guard report is received, reviewed, organized, and evaluated with expert assistance. Proceeding prematurely risks inefficient discovery, duplicative depositions, and avoidable disputes.
12. The Coast Guard report is also expected to shed light on issues bearing on culpability and comparative responsibility, including how long the ferry may have operated without a functioning stern light, what the captain and crew knew or should have known, and how those facts relate to visibility, lookout expectations, and causation.
13. The report may further illuminate the factual basis for the State's charging decisions,

including why the Defendant faces multiple counts alleging serious injury or death while the ferry captain has been charged with a single count arising from the same incident and involving the same victims. The defense is entitled to explore whether the factual distinctions, if any, support the differing charging decisions.

14. The State's most recent witness list identifies more than 180 witnesses. Even under conservative assumptions, the time required to depose these witnesses, accounting for scheduling issues, travel, transcript review, follow-up investigation, and motion practice, is extraordinary.
15. The discovery produced to date is voluminous. It includes over 1,000 photographs and at least 325 audio and video recordings, ranging from seconds to nearly two hours in length. Many recordings cannot be meaningfully identified by file name alone and must be individually reviewed, logged, and indexed. Competent review of this evidence requires careful, and often repeated, examination. Florida courts have recognized that failure to adequately review critical evidence before trial may constitute ineffective assistance of counsel. *See, generally, Gutierrez v. State*, 27 So. 3d 192, 194 (Fla. 5th DCA 2010).
16. Discovery also includes medical records for sixteen (16) alleged victims, some exceeding 100 pages. These records must be analyzed for causation, injury attribution, and issues affecting proof and sentencing exposure. Expert review is reasonably anticipated.
17. It is in the best interests of the Court, the parties, the victims, and the public that this case be tried once, and tried correctly. An artificially compressed trial schedule in a case of this magnitude creates an unnecessary risk of postconviction litigation and the possibility of a retrial years later. *See Ridenour v. State*, 768 So. 2d 480 (Fla. 2d DCA 2000) (reversing conviction based on ineffective assistance of counsel).
18. A trial period commencing no sooner than August 2027 materially reduces that risk by allowing discovery, depositions, expert analysis, and pretrial litigation to be completed in an orderly, trial-ready manner.
19. Under these circumstances, deferring routine pretrial conferences until February 2027 and setting a trial period no sooner than August 2027 is reasonable and appropriate. Trial courts possess broad discretion to manage their dockets and to grant continuances for good cause. *See Fla. R. Crim. P. 3.190(f)(2)*. Given the posture and complexity of this case, ensuring fairness and due process requires a schedule that allows for meaningful trial preparation.
20. By way of example, and without suggesting these cases are identical, the defense notes the following timelines in other complex cases before this Court:

- a. State v. Gillis, Case No. 11-08815-CF, arrested April 2011, tried October 2015 (approximately 4 years and 6 months).
- b. State v. Najjar, Case No. 18-08833-CF, filed July 2018, tried November 2021 (approximately 3 years and 4 months).
- c. State v. Thornton, Case No. 19-15437-CF, arrested December 2019, tried March 2023 (approximately 3 years and 3 months).
- d. State v. Cobb, Case No. 22-04207-CF, arrested April 2022, resolved by plea in February 2025 (approximately 2 years and 9 months).
- e. State v. Peruchi, Case No. 17-02366-CF, arrested February 2017, set for trial July 2019 (approximately 2 years and 5 months).
- f. State v. Molinas, Case No. 22-09348-CF, filed September 2022, resolved by plea in February 2025 (approximately 2 years and 4 months).
- g. State v. Feaster, Case No. 15-02569-CF, arrested March 2015, tried June 2017 (approximately 2 years and 3 months).

These examples demonstrate that extended preparation periods are not unusual where complexity and exposure warrant it. The Defendant seeks parity, not preference.

21. Deferring routine pretrial conferences until February 2027 will conserve judicial resources, reduce unnecessary appearances, and align case management with the realities of preparation in a matter of this scope.
22. At a February 2027 case management or status conference, the parties will be in a position to assess readiness milestones, identify anticipated motions, and proceed on a realistic trial trajectory.
23. Defendant expressly acknowledges that the requested relief includes a waiver of speedy trial pursuant to Florida Rule of Criminal Procedure 3.191, to the extent necessary to effectuate the relief sought herein.
24. The defense seeks no special treatment, only the same deliberate and measured approach afforded to other complex, high-exposure cases.
25. Proceeding to trial before the defense can responsibly and competently prepare would undermine the Defendant's right to effective assistance of counsel. Raising this issue now serves the interests of the Court, the parties, and the victims by helping ensure that when this case is tried, it is tried once, fully, fairly, and correctly.

WHEREFORE, Defendant respectfully requests that the Court enter an order: (1) Deferring

further routine pretrial conferences in this matter until February 2027, except as may be specially set by the Court or upon motion showing good cause; (2) Setting a case management or status conference in February 2027 (at a date convenient to the Court); (3) Accepting Defendant's waiver of speedy trial pursuant to Fla. R. Crim. P. 3.191 to the extent necessary to effectuate the requested relief; and (4) Setting the matter for a trial period commencing no sooner than August 2027 (or calendar call leading into that period consistent with the Court's docketing procedures), and granting such other relief as the Court deems just and proper.

CERTIFICATE OF GOOD FAITH

Undersigned counsel, consistent with Fla. R. Crim. P. 3.190(f)(4), certifies that this Motion for Continuance is filed in good faith, is based on legitimate grounds, and is not interposed for delay, but rather to ensure adequate preparation and the Defendant's right to a fair trial.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished via E-Filing to the Clerk of the Court and the Office of Bruce Bartlett, State Attorney, on this 9th day of January, 2026.

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