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Sent to Judge
Date 5-5-26

April 29, 2026

The Honorable Pat Siracusa
Sixth Circuit Judge
14250 49th Street North
Clearwater, FL 33762

Re: State v. Jeff Knight, Case No.: 25-06211-CF
Defense Status Update – Discovery and Scheduling

Dear Judge Siracusa,

I write to provide a status update regarding the progress of this case and ongoing discovery efforts. The defense recognizes and appreciates the Court's desire to move this matter forward as expeditiously as possible. However, despite diligent efforts, several substantial and unavoidable issues remain that will require additional time.

First, the scope of discovery continues to be extensive. To date, approximately 50 hours of depositions have been conducted of ferry passengers on March 17 through 19 and April 14 through 16. Four additional full days in May have been scheduled for depositions of Clearwater Police Department officers. Following those depositions, we anticipate that approximately 60 witnesses will have been deposed.

After the next round of depositions is completed, approximately 150 witnesses will remain to be deposed. Preparation for some of these depositions will require consultation with defense experts, and several will likely require full-day sessions.

These demands are compounded by a parallel civil case pending in the Middle District of Florida. In that matter, Mr. Knight was deposed for seven hours, requiring my preparation and attendance. In addition, counsel for the decedent has scheduled a deposition of me personally and indicated it will take a full day. As a result, this case is not proceeding in isolation. The parallel civil action has required significant additional time and resources, which necessarily affect preparation in the criminal case.



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Second, both the State and defense continue to face significant delays related to the involvement of the United States Coast Guard. In October 2025, USCG Investigator Brian Knapp advised the State Attorney's Office that the federal government shutdown had delayed the discovery process. He further indicated that he would attempt to prepare a limited narrative regarding the initial Coast Guard response, but that any disclosure would require approval from the Coast Guard legal department, which was also affected by the shutdown. To date, no such narrative has been provided to either party.

In January, the defense attempted to subpoena several Coast Guard personnel, including Supervisory Special Agent Brandon Maddox, Chief Warrant Officer Ronald Gleason, Chief of Inspections Brian Knapp, Designated Federal Official Kyle Quimby, and Investigator Justin Cooksie. We were subsequently advised by a USCG Staff Judge Advocate that our method of service did not comply with federal requirements.

The defense then withdrew those notices and submitted a formal request for official information and testimony pursuant to Department of Homeland Security *Touhy* regulations. To date, no response has been received. A follow up request was sent earlier this week, and we continue to await any communication from the Coast Guard.

These Coast Guard witnesses are essential to the defense. While the Florida Fish and Wildlife Conservation Commission investigated my client, the Coast Guard was responsible for investigating the commercial vessel involved in the incident, including potential violations of maritime law.

The Coast Guard's findings are expected to be highly relevant, if not critical, to the allegations against my client and to issues of causation that will require consultation with maritime experts.

In addition, multiple passengers reported during their depositions that Coast Guard personnel conducted detailed interviews shortly after the incident. To date, the defense has not received any summaries, reports, or documentation of those interviews, further demonstrating that discovery remains incomplete.

Available discovery also indicates that the Coast Guard took possession of physical evidence from the ferry. However, the scope of that evidence, and the Coast Guard's assessment of its relevance, remain unclear.

Finally, the State has filed a notice of intent to rely on Williams rule evidence arising from a prior boating incident involving the Defendant. That filing substantially expands the scope of preparation. Additional witnesses must now be deposed, the underlying case materials, including hundreds of pages of transcripts, must be reviewed, and legal research and a written response to the State's notice will be required. The notice will also necessitate a hearing before the Court. Collectively, this additional work will require approximately 45 to 90 days to schedule and complete.

I have discussed this status update with Assistant State Attorney Anthony Bradlow, and a copy of this correspondence is being provided to him. Based on our discussions, it is my understanding that the State agrees additional time is necessary to complete discovery in a manner that ensures fairness to all parties.

For these reasons, the defense respectfully submits that the case is not yet in a posture to proceed to trial and suggests setting the next pretrial in early August. We remain committed to moving forward as efficiently as possible and will continue to keep the Court apprised of developments

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'J. Hayslett', with a stylized flourish at the end.

J. KEVIN HAYSLETT, ESQUIRE