

IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT  
IN AND FOR BREVARD COUNTY, FLORIDA

STATE OF FLORIDA,  
Plaintiff,

CASE NO. 052012CF035337AXXXXX

vs.

BRANDON LEE BRADLEY,  
Defendant.

---

**MOTION FOR CONTINUANCE**

COMES NOW the State of Florida, by and through the undersigned Assistant State Attorney, hereby moves this Honorable Court pursuant to Fla.R.Crim.P. 3.190 to continue this cause and as grounds therefore states:

1. That this cause is currently set for TRIAL on 01/28/2014 9:00 am.
2. On December 9, 2013 Defendant filed a "Defendant's Witness List" listing two potential expert witnesses the defense expects to call in this matter: Susan M. Skolly-Danzier, a forensic toxicologist, and Jacquelyn Olander, a psychologist. Copies of the reports prepared by each expert were provided detailing their conclusions/diagnosis based on their examinations of the defendant, however, all of the raw data, testing materials, results, etc. were NOT provided by defense counsel.
3. On December 17, 2013, defense counsel advised undersigned counsel that such experts could be expected to testify in BOTH the guilt and penalty phases of the trial.
4. Also on December 17, 2013, defense counsel filed a "Supplemental Defense Witness List listing twenty-six (26) additional potential defense witnesses.
5. On January 8, 2014, defense counsel filed a "Disclosure of Defense Mental Health Experts Witnesses" listing two additional Mental Health Experts ( Joseph Wu, M.D., and Mark Herbst, M.D.)
6. On January 9, 2014, defense counsel filed a "Disclosre To The State" providing reports of Dr. Wu and Dr. Mark Herbst setting forth their conclusions/diagnosis regarding their examinations of medical testing done on the Defendant, however, once again the testing materials and other data relied upon them in forming their opinions has NOT been provided.
7. On January 10, 2014, defense counsel filed a Motion For Change of Venue in this case requesting that the case be tried outside of Brevard County.
8. On January 9, 2014, undersigned counsel spoke with the Office of the Medical Examiner and was informed that critical witness, Dr. Sajid Qaiser, the medical examiner who conducted the autopsy on the victim in this case, would be out of the country and unavailable from January 27, 2014 through February 18, 2014.
9. Additional time is needed to obtain all of the defense experts' testing/examination materials so that such materials may be reviewed by the State's experts, to ensure

that Dr. Qaiser would return from out of the country, and to allow the state to depose the new defense witnesses recently listed by the defense.

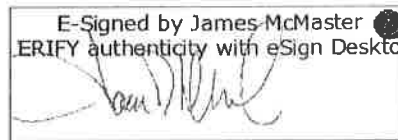
10. This motion is made in good faith and not for any dilatory purpose.

WHEREFORE, for the foregoing reasons, the State of Florida requests this Honorable Court to continue this cause.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by **E-MAIL** to OFFICE OF THE PUBLIC DEFENDER - FELONY, Attorney for Defendant, at BREVARDFELONY@PD18.NET this 13th day of January, 2014.

PHIL ARCHER  
STATE ATTORNEY



BY:

JAMES D. MCMASTER  
ASSISTANT STATE ATTORNEY  
FLORIDA BAR NO. 220061  
2725 JUDGE FRAN JAMIESON WAY, BLDG D  
VIERA, FL 32940  
(321) 617-7510  
Eservice: BrevFelony@sa18.state.fl.us