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IN THE CIRCUIT COURT FOR THE  
EIGHTEENTH JUDICIAL CIRCUIT IN AND  
FOR BREVARD COUNTY, FLORIDA  
Case No 2012-CF-35337-A

STATE OF FLORIDA  
  
Plaintiff,  
  
vs  
  
BRANDON LEE BRADLEY

HATCH NEEDLEMAN  
2012 MAR 26 P 12:18  
CLERK OF CIR. CT.  
BREVARD CO FL.

**MOTION TO INTERVENE FOR THE LIMITED PURPOSES OF  
OPPOSING DEFENDANT'S MOTIONS TO PRECLUDE THE STATE OF FLORIDA  
AND ITS AGENTS FROM DISCLOSING PRE-TRIAL DISCOVERY TO THE PUBLIC**

Movant, CAPE PUBLICATIONS, INC , d/b/a FLORIDA TODAY (hereinafter referred to as "FLORIDA TODAY") in order to protect its constitutional and statutory rights of access to public courtrooms, public information and court records moves to intervene in these proceedings for the limited purposes of opposing DEFENDANT'S MOTIONS TO PRECLUDE THE STATE OF FLORIDA AND ITS AGENTS FROM DISCLOSING PRE-TRIAL DISCOVERY TO THE PUBLIC and as a basis states

1 FLORIDA TODAY is a newspaper and media outlet which publishes and distributes daily and weekend newspaper in Brevard County and in east central Florida It additionally posts its news on its website

2 This case concerns the murder of a Sheriff's Deputy and is a matter of great public interest and has been and will be, the subject of articles and editorials in both FLORIDA TODAY as well as all other media outlets in Florida FLORIDA TODAY has been served with Defendant's Motions to Prelude the State of Florida from disclosing pre-trial discovery to the public and as such, constitutes motions seeking to restrict public and the media's access to public courtrooms public information and court records



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4 It appears from the motions filed by the Defendant, Defendant is seeking unconstitutional orders of prior restraint, as well as gag orders, orders sealing and closing public records and preventing the reporting of statements made in open court

5 For the purpose of opposing these motions, FLORIDA TODAY seeks to intervene in this case to file motions of its own and objections to the motions of the Defendant

6 Florida courts have recognized that the news media have standing to intervene and challenge motions seeking orders such as that are sought by the Defendant herein State of Florida vs McIntosh, 340 So 2d 904 (Fla 1976)

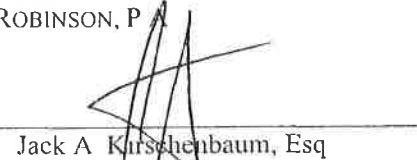
WHEREFORE, CAPE PUBLICATIONS, INC , d/b/a FLORIDA TODAY moves this Court to allow it to intervene in these proceedings for the limited purpose of opposing any motions or argument to close access to the public courtrooms, public information, court records or prevent the reporting of statements made in open court

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion has been provided to the following via U S Mail on this 23 day of March, 2012 to Michael Mario Purolo, Esquire, Assistant Public Defender, 2725 Judge Fran Jameson Way, Building E, Viera, Florida 32940, Wayne Holmes, State Attorney's Office, 2725 Judge Fran Jameson Way, Bldg, C, 3, Viera, Florida 32940, Sheriff J R "Jack" Parker, Brevard County Sheriff's Department, 700 Park Avenue, Titusville, Florida 32780 and Michael Bross, Esquire, A Michael Bross, P A , 997 S Wickham Road, Melbourne, Florida 32904

GRAYROBINSON, P A

By



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