

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT IN
AND FOR MIAMI-DADE COUNTY, FLORIDA

STATE OF FLORIDA,

CASE NO: F23021321

Plaintiff,

JUDGE: Hersch (F013)

vs.

DEREK ROSA

AMENDED DISCOVERY EXHIBIT

COMES NOW KATHERINE FERNANDEZ RUNDLE, State Attorney of the Eleventh Judicial Circuit of Florida, by and through the undersigned Assistant State Attorney, and files this Amended Discovery Exhibit under Florida Rule of Criminal Procedure Rule 3.220, as follows:

The below expert witnesses are being listed in response to the listing of defense expert Dr. James Campbell. The witnesses are listed as reasonably anticipated rebuttal witnesses

Until such time that the Court grants the State's pending motion to compel records, or the defense withdraws its objection and provides access to such records, these witnesses may not be set for deposition as they have not formed any final opinions in this matter.

Accordingly, the State formally renews its motion to compel for the reasons previously set forth in pleadings contained in the court file. Any delay in the above listed expert witnesses formulating final opinions in this matter is the product of being denied access to necessary information, and is not be attributed to the witnesses or to the State.

WITNESSES

(E) 086. RICHARDSON, DR RALPH
1175 NE 125 STREET ,Apt#: 410
NORTH MIAMI FL 33161-5015

(E) 087. BRANNON, DR MICHAEL
11760 W SAMPLE RD ,Apt#: 103
CORAL SPRINGS FL 33065-3199

(AS) = Category A witnesses who were present when a statement was taken from or made by the defendant or co-defendant.

Respectfully submitted

BY: _____

/S/JONATHAN BORST

(Bar#:85739)

Assistant State Attorney

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and exact copy of the above was furnished to Dayliset Rielo, THE RIELO LAW FIRM, 8180 NW 36TH STREET, #220, Doral, Fl 33166, Dayliset@rielolaw.com by e-mail on July 25, 2025.

BY: _____

/S/JONATHAN BORST

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