

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

STATE OF FLORIDA,

Plaintiff,

vs.

CASE NO.: 2012-001083-CFA

GEORGE ZIMMERMAN,

Defendant.

MOTION FOR ORDER ISSUING SUBPOENAS DUCES TECUM

COMES NOW the Defendant, GEORGE ZIMMERMAN, by and through his undersigned counsel, and hereby files this his Motion for Order Issuing Subpoenas Duces Tecum, and as grounds therefore states as follows:

1. On April 11, 2012, Mr. Zimmerman was arrested, and charged with the offense of Second Degree Murder in violation of *Florida Statute* Section 782.04, a first degree felony punishable by up to the maximum punishment of life in prison.
2. Mr. Zimmerman has involved himself in the discovery process pursuant to *Florida Rule of Criminal Procedure* 3.220.
3. Mr. Zimmerman requests this Honorable Court to Order the issuance of subpoenas duces tecum, as this information is necessary to properly prepare and present the defense on Mr. Zimmerman's behalf, pursuant to Rule 3.220, *Florida Rules of Criminal Procedure*, and as is

guaranteed by the Sixth Amendment to the United States Constitution.

4. Mr. Zimmerman requests issuance of subpoenas duces tecum to the following entities:

A. Dr. Michael M. Krop Senior High: Good cause exists for the issuance of a subpoena duces tecum to this entity for all records regarding Trayvon Martin during his period of enrollment, in that this information is discoverable as it is reasonably calculated to lead to relevant, admissible evidence, and is therefore material to the preparation of the defense. Further information required will be disclosed on the face of the subpoena.

B. Miami Carol City High School: Good cause exists for the issuance of a subpoena duces tecum to this entity for all records regarding victim, Trayvon Martin during his period of enrollment, in that this information is discoverable as it is reasonably calculated to lead to relevant admissible evidence, and is therefore material to the preparation of the defense. Further information required will be disclosed on the face of the subpoena.

C. Miami-Dade County Public Schools: Good cause exists for the issuance of a subpoena duces tecum to this entity for all records regarding victim, Trayvon Martin during his period of enrollment, in that this information is discoverable as it is reasonably calculated to lead to relevant admissible evidence, and is therefore material to the preparation of the defense. Further information required will be disclosed on the face of the subpoena.

D. Norland Middle School: Good cause exists for the issuance of a subpoena duces tecum to this entity for all records regarding victim, Trayvon Martin during his period of enrollment, in that this information is discoverable as it is reasonably calculated to lead to relevant

admissible evidence, and is therefore material to the preparation of the defense. Further information required will be disclosed on the face of the subpoena.

E. Twitter: Good cause exists for the issuance of a subpoena duces tecum to this entity for information regarding all accounts held in the victim, Trayvon Martin's name, in that this information is discoverable as it is reasonably calculated to lead to relevant admissible evidence, and is therefore material to the preparation of the defense. Further information required will be disclosed on the face of the subpoena.

F. Twitter: Good cause exists for the issuance of a subpoena duces tecum to this entity for information regarding all accounts held in State's witness's name, - redacted -, a juvenile, in that this information is discoverable as it is reasonably calculated to lead to relevant admissible evidence, and is therefore material to the preparation of the defense. Further information required will be disclosed on the face of the subpoena.

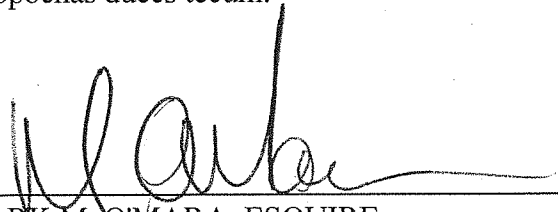
G. Facebook: Good cause exists for the issuance of a subpoena duces tecum to this entity for information regarding all accounts held in the victim, Trayvon Martin's name, in that this information will either include or will lead to relevant admissible evidence. Further information required will be disclosed on the face of the subpoena.

H. Facebook: Good cause exists for the issuance of a subpoena duces tecum to this entity for information regarding all accounts held in State's witness's name, -redacted-, a juvenile, in that this information is discoverable as it is reasonably calculated to lead to relevant admissible evidence, and is therefore material to the preparation of the defense. Further information required will be disclosed on the face of the subpoena.

I. T-Mobile: Good cause exists for the issuance of a subpoena duces tecum to this entity for all accounts held in the victim, Trayvon Martin's name for the period from January 1, 2012 through June 1, 2012, in that this information is discoverable as it is reasonably calculated to lead to relevant admissible evidence, and is therefore material to the preparation of the defense. Further information required will be disclosed on the face of the subpoena.

J. T-Mobile: Good cause exists for the issuance of a subpoena duces tecum to this entity for all accounts held in State's witness's name, - redacted-, a juvenile, for the period from January 1, 2012 through present, in that this information is discoverable as it is reasonably calculated to lead to relevant admissible evidence, and is therefore material to the preparation of the defense. Further information required will be disclosed on the face of the subpoena.

WHEREFORE, the Defendant respectfully requests this Honorable Court to enter its Order granting the issuance of the above-referenced subpoenas duces tecum.



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Co-Counsel for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Facsimile/E-Mail this 5th day of October, 2012 to:

Bernie de la Rionda, Assistant State Attorney
John Guy, Assistant State Attorney
Office of the State Attorney
220 East Bay Street
Jacksonville, Florida 32202-3429

Donald R. West, Esquire
636 West Yale Street
Orlando, Florida 32804

FURTHER, I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Facsimile/E-Mail this 5th day of October, 2012 to:

Benjamin L. Crump, Esquire
Parks & Crump, LLC
240 North Magnolia Drive
Tallahassee, Florida 32301-2638
(as Representative of Tracy Martin and Sybrina Fulton)
(as Representative of Tracy Martin and Sybrina Fulton, on behalf of the Estate of Trayvon Martin)

Bernie de la Rionda, Assistant State Attorney
John Guy, Assistant State Attorney
Office of the State Attorney
220 East Bay Street
Jacksonville, Florida 32202-3429
(on behalf of 'redacted' juvenile witness)
(on behalf of Tracy Martin and Sybrina Fulton)
(on behalf of the Estate of Trayvon Martin)

FURTHER, I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Facsimile/U.S. Mail this 5th day of October, 2012 to:

Dr. Michael M. Krop Senior High
Attention: Dawn M. Baglos, Principal
Attention: Grace Lopez, Registrar
1410 County Line Road
Miami, Florida 33179

Miami Carol City High School
Attention: Jamarv R. Dunn, Principal
Attention: Keisha Person, Registrar
3301 Miami Gardens Drive
Miami Gardens, Florida 33056

Norland Middle School
Attention: Ronald G. Redmon, Principal
Attention: Celeste Brown, Registrar
1235 NW 192nd Terrace
Miami, Florida 32169

T-Mobile USA
Law Enforcement Relations Group
4 Sylvan Way
Parsippany, New Jersey 07054

Twitter, Inc.
c/o Trust & Safety
1355 Market Street, Suite 900
San Francisco, California 94103

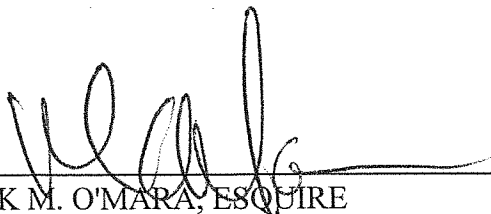
FURTHER, I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail this 5th day of October, 2012 to:

Miami-Dade County Public School
Attention: Alberto M. Carvalho, Superintendent
1450 NE 2nd Avenue
Miami, Florida 33132

FURTHER, I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Facsimile/E-Mail/U.S. Mail this 5th day of October, 2012 to:

Facebook
Attention: Facebook Security, Law Enforcement Response Team
18 Hacker Way
Menlo Park, California 94025

Facebook
Attention: Security Department
1601 South California Avenue
Palo Alto, California 94304


MARK M. O'MARA, ESQUIRE