

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

FILED IN
EAST BRANCH OFFICE
MARGYANN MORSE
CLERK CIRCUIT COURT
13 MAY 21 PM 4: 11
BY SEMINOLE CO. FLA. D.C.

STATE OF FLORIDA,

Plaintiff,

vs. ..

CASE NO.: 2012-001083-CFA

GEORGE ZIMMERMAN,

Defendant.

MOTION TO ESTABLISH REASONABLE EXPERT FEE

COMES NOW the defendant, GEORGE ZIMMERMAN, by and through his undersigned counsel, and moves this Honorable Court to establish a reasonable expert fee for the State's voice identification expert, Tom Owen, to be paid for appearing at his deposition. In support thereof the defendant shows the following:

The State has disclosed Tom Owen as an expert witness in the area of voice identification. The defendant seeks to take Mr. Owen's deposition. The defendant has been advised through the State that Mr. Owen requires a fee of \$3,300 paid in advance of his deposition. It is expected that Mr. Owen's deposition will take approximately two hours. Mr. Owen's fee is unreasonable and serves to deny the defendant the opportunity to conduct meaningful discovery in a highly contested area of evidence. If the State intends to offer the testimony of Mr. Owen, it should be required to produce Mr. Owen for deposition at its cost or the Court should establish a reasonable fee for Mr. Owen's time. In that regard, counsel suggests a reasonable fee would be between \$250 and \$400 per hour.

WHEREFORE, the defendant urges this Honorable Court to grant the relief requested.

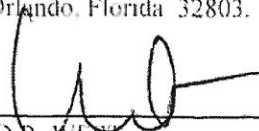
Respectfully submitted this 21 day of May, 2013.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail/Email/Hand Delivery this 21 day of May, 2013 to Bernie de la Rionda, Assistant State Attorney, Richard Mantei, Assistant State Attorney and John Guy, Assistant State Attorney, Office of the State Attorney, 220 East Bay Street, Jacksonville, Florida 32202-3429, and Mark M. O'Mara, Esquire, 1416 East Concord Avenue, Orlando, Florida 32803.



DONALD R. WEST