

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA  
CRIMINAL DIVISION "W"

CASE NO. 2010CF005829AMB

STATE OF FLORIDA

vs.

JOHN GOODMAN

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**STATE RESPONSE TO DEFENDANT'S MOTION TO PRODUCE CRIME  
SCENE PHOTOS**

THE STATE OF FLORIDA, by and through the undersigned Assistant State Attorney, responds to the Defendant's Motion to Produce Crime Scene Photos and/or Certification as follows:

1. The Defense Motion to Produce is essentially a Demand for Discovery.
2. The State has complied with the discovery requirements of Rule 3.220 and has made available to both the Black Law Firm and current counsel all known discovery materials in this matter multiple times.
3. The statement by defense counsel that "it is inconceivable that not one photo was taken of the vehicle while in the canal" is pure hyperbole and has no legal significance.
4. Photographs taken by Deputy Ruben Cruz, as testified to in deposition, have been previously provided to defense, in the original discovery to the Black Law Firm, and, again, provided to current counsel.
5. Defense counsel has diligently participated in discovery and conducted its own extensive investigation into this case. This includes discovery of all law enforcement personnel recorded by PBSO records as being on scene the morning of the crash. Depositions have been taken of all deputies and fire rescue personnel who were not previously deposed by the Black Law Firm. There is no indication that any person took photographs that have not already been provided to defense in discovery.