

IN THE CIRCUIT COURT OF THE FIFTH
JUDICIAL CIRCUIT IN AND FOR MARION
COUNTY, FLORIDA.

STATE OF FLORIDA,
Plaintiff,
vs.

CASE NO. 2020-CF-4668-A-X

NEELY L. PETRIE-BLANCHARD,
Defendant.

MOTION FOR CONTINUANCE OF TRIAL

COMES NOW the Defendant, **NEELY L. PETRIE-BLANCHARD**, by and through her undersigned attorney, and files this Motion for Continuance of the **Trial** specially set on **April 15, 2024**, and would show unto this Honorable Court the basis for same, to wit:

1. That predicated upon "unforeseen circumstances", the Defendant has developed a sense of mistrust, as far as the direction that her undersigned counsel has developed, or will develop, at the time of trial, which has led to counsel's dismissal.

2. The Defendant has most recently [initially] terminated the services of the undersigned on the Internet and then, one on one, at a meeting at the Marion County Jail, this date.

3. That the abnormal and highly publicized termination of counsel appears to have created a witness availability issue for the Defendant. Counsel is no longer receiving return phone calls from witnesses and cannot assure their presence at the time of trial.

4. Additionally, that the amount of discovery that has been accumulated, is so complex and extensive, that it would be impossible for the Defendant, nor substitute counsel, to become adequately prepared for trial, as presently scheduled, within the next thirty days.

5. That the Defendant has been traveling on "psychological" deficiencies, throughout the legal process; it readily appears that the Defendant's lack of stability, has manifested itself, once again, in her decision making process.

6. Nonetheless, the Defendant's choice to fire her attorney and in the manner she has chosen to do so, has created a "bridge of harm", which cannot be repaired and in turn, established a factual necessity, which would warrant a continuance of this trial and afford the Defendant an opportunity to obtain substitute counsel.

WHEREFORE, it is requested that this case be removed from the April 15, 2024 Trial Docket, and set at the Court's discretion, to afford the Defendant ample opportunity to obtain substitute counsel and/or prepare for trial, accordingly.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by E-SERVICE TRANSMISSION this 19th

day of March, 2024, to: **AMY BERNDT, ASST. STATE ATTORNEY**, 110 NW
First Avenue, Ocala, FL 34475.

Law Offices of Jack R. Maro, P.A.
Post Office Box 3868
Ocala, Florida 34478
(352) 620-0797
Ocalaw@ocalaw.cfcoxmail.com

/s/ Jack R. Maro

By: _____
JACK R. MARO, ESQUIRE
Florida Bar No. 174775

UNOFFICIAL
DOCUMENT