

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

STATE OF FLORIDA,

CASE NO.: 98-5739 CF 10A

Plaintiff,
vs.

ERNESTO BEHRENS,

Defendant.

AMENDED NOTICE OF APPEARANCE
(Limited as to scope of representation)

V. Julia Luyster, Esq. of V. Julia Luyster P.A., files this Amended Notice of Appearance limiting the scope of representation for Defendant Ernesto Behrens to his Motion to Compel and Addendum to Motion to Compel.

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via eportal on this 8th day of March, 2017, to the State Attorneys' Office, 201 SE 6 St., Ft. Lauderdale, FL 33301 courtdocs@sao17.state.fl.us, and to Tiffany Roy, tiffany.roy@gmail.com.

/s/ V. Julia Luyster____
V. JULIA LUYSTER, ESQ.
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**ADDENDUM TO DEFENDANT'S MOTION COMPEL THE STATE TO
DISCLOSE THE EXISTENCE, LOCATION AND AVAILABILITY OF THE
PHYSICAL EVIDENCE COLLECTED IN THIS CASE, WHICH ARE
INDISPENSABLE FOR DNA TESTING**

Defendant Ernesto Behrens (Defendant "Behrens") by and through undersigned counsel, and pursuant to the applicable Fla. R.Crim. P., respectfully files this Addendum to his pending Motion to Compel, requesting additional evidence, originally filed on November 8, 2016 and refiled on December 2, 2016. In furtherance therefore, Defendant would show as follows:

1. On January 6, 2017, this Honorable Court issued an Order for the State to respond within 60 days to Defendant's Motion to Compel.
2. On March 7, 2017, the State failed to timely comply with this Court's order.
4. Defendant's DNA Consultant, Tiffany Roy, recently requested to see and review the following necessary additional evidence in possession of the State, in order to effectively assist the Defendant in this case:

- ° The analyst case file.
- ° The electropherograms (or equivalent) from the testing.
- ° All print outs and worksheets from the serology testing (finding of body fluids).
- ° All DNA testing process.
- ° Any calculations made by Broward Sheriff's Office analyst to convey a frequency of the DNA profile obtained from the evidence.
- ° Any report generated by Dr. Martin Tracey and any calculations he made in support of his conclusions in this case.

Wherefore, Defendant prays this Honorable Court grant this Addendum to his currently pending Motion to Compel and direct the State of Florida/BSO Crime Laboratory, Dr. Martin Tracey, to comply with the production of the above stated evidence to be analyzed and adequately reviewed by Defendant's DNA Consultant, Tiffany Roy.

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