

**IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT  
IN AND FOR MIAMI-DADE COUNTY, FLORIDA**

STATE OF FLORIDA, Case No. M18-12868

*Plaintiff,* Section No. C

vs. Judge MICHAEL BARKET

MARIO FIGUEROA,

*Defendant*

**MOTION FOR CONTINUANCE**

COMES NOW KATHERINE FERNANDEZ RUNDLE, State Attorney of the Eleventh Judicial Circuit of Florida, by and through the undersigned Assistant State Attorney, and moves for a continuance herein and, in support of said motion, alleges the following grounds, to wit:

The victim, David Suazo, is currently in custody in Broward County jail on a detainer from Holmes Correctional Institution. The State has been unable to secure Suazo's appearance for trial for the following reasons:

1. On April 11, 2019, the State obtained a signed order with certified copies to transport Mr. Suazo to Miami-Dade County to testify for trial;
2. The State contacted the booking Sergeant for Broward County Jail to make arrangements to pick up Mr. Suazo and was directed to speak to "Cynthia" in transportation;
3. The State contacted Cynthia. During the process of obtaining detailed information regarding the procedure for obtaining a release via detainer, the State was informed that Mr. Suazo was already on a detainer from Holmes Correctional Institute to Broward County and therefore "un-releasable";
4. Cynthia explained that the State should contact both the Warden for Holmes C.I. and Circuit Court Judge who ordered Mr. Suazo's presence in Broward County and seek the court's approval for Mr. Suazo's release from Broward County custody to Miami-Dade County custody;
5. The State contacted the Warden's office at Holmes C. I. and after several phone call transfers, was directed to speak with Vicky Newson, who is a supervisor for transportation at headquarters for the Florida Department of Corrections;
6. Ms. Newson contacted the Broward County Department of Corrections on the State's behalf and was informed that Broward County will not release Mr. Suazo to Miami-Dade County while he is in their custody due to past issues with the transportation of prisoners to and from Miami-Dade County; AND
7. The State was informed that we can take custody of Mr. Suazo only after Broward was "done with him," which is a date uncertain.

WHEREFORE, for good cause shown, this Honorable Court is requested to grant the Motion.

THIS IS TO CERTIFY that the above and foregoing Motion for Continuance is made in good faith and for the reasons herein alleged.

Respectfully submitted,

KATHERINE FERNANDEZ RUNDLE  
STATE ATTORNEY

By: \_\_\_\_\_

/s/KERRIE S. CROCKETT

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and exact copy of the above was furnished to ROBERT BUSHEL, by on this 12th day of April, 2019.

\_\_\_\_\_  
/s/KERRIE S. CROCKETT

Assistant State Attorney