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IN AND FOR THE CIRCUIT COURT
14th JUDICIAL CIRCUIT, BAY COUNTY, FLORIDA

STATE OF FLORIDA.)
)
 Plaintiff.)
)
 v.)
)
 RANDY FOWLER)
 AKA JIM BIKEMAN)
)
 Defendant.)
 _____)

CASE NUMBER 11002530CFMA

BILL KINSA
CLERK OF COURT
BAY COUNTY, FLORIDA

2012 JAN 17 A 10:58

FILED

**MOTION FOR LEAVE OF COURT AND EXTENSION OF TIME IN WHICH TO
FILE AN AMENDED PETITION FOR HABEAS CORPUS**

DEFENDANT, through his undersigned representative, hereby respectfully moves this Court to issue an ORDER, permitting Defendant an opportunity to file an Amended Petition for Habeas Corpus within thirty (30) days of the ORDER or within any other time set by the Court. Defendant states the following in support thereof:

On or about January 10, 2012, this Court received and docketed a "pro se" Petition for Writ of Habeas Corpus from Defendant who is currently involuntarily incarcerated at the Florida State Hospital at Chattahoochee, Florida by ORDER of this Court and deprived of his Social Security disability income.

Since that time Defendant has requested and authorized the undersigned to represent him in Habeas Corpus proceedings before this Court pursuant to **Section 916.107(9)(a) F.S.**

After investigation of factual and legal matters related to Habeas Corpus the undersigned has determined, and Defendant concurs, that an Amended Petition for Habeas Corpus should be filed.

Furthermore, Defendant did not have access to commitment files and records or other discovery records in preparation of his *pro se* petition. The undersigned requires additional time in which to gain access to these records, review them, and prepare an Amended Petition for Writ of Habeas Corpus on behalf of Defendant pursuant to **Section 916.107(9)(a) F.S.**

The undersigned's preliminary factual and legal investigation dictates that an amended petition is required.

Defendant has competently cooperated with the undersigned in preparing his defenses and his challenge to be released from state incarceration through Habeas Corpus proceedings.

WHEREFORE, this Court is respectfully requested to issue an ORDER granting Defendant, through his undersigned representative, time in which to file an Amended Petition for Habeas Corpus for at least thirty (30) days from the ORDER.

Respectfully Submitted this 14th Day of January 2012,



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Certificate of Service

I hereby certify that a true and exact copy of the foregoing, and all attachments if any, was provided to the following by electronic mail, by FAX, or other means this 14th day of January 2012 with the original filed with this Court.

Resident Legal Services¹


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KEVIN E. WOOD

¹ Resident legal counsel at Chattahoochee, Mr. McCormick, is respectfully requested to provide a copy of all pleadings, communications, etc. received from Mr. Wood to Defendant Fowler as a resident forensic client.