

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

CASE NO.: 16-010310CF10A

JUDGE: ROTHCHILD

STATE OF FLORIDA
Plaintiff,

vs.

JUAN RAMOS,
Defendant.

MOTION TO VACATE CAPIAS

COMES NOW the Defendant, by and through the undersigned attorney, and moves this Court for an order withdrawing the capias; and as grounds, the Defendant states the following:

1. Undersigned counsel was unaware a calendar call was set for October 14, 2021.
2. A capias was issued, due to no fault of the defendant.
3. The Defendant has always timely appeared when requested, and there is no problem with his attendance
4. The Defense continues to participate in discovery and is working on setting the final deposition with the State.
5. Other grounds to be argued Ore Tenus.

WHEREFORE the Defendant moves this Honorable Court to vacate the capias.

I HEREBY CERTIFY that the original was e-filed and a copy was delivered by e-service to the Office of the State Attorney, Broward County, at courtdocs@sao17@state.fl.us this 30h day of November, 2021.

/s Kevin J. Kulik, P.A.
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