

IN THE SUPREME COURT OF FLORIDA  
(Before a Referee)

Supreme Court Case  
No(s): SC21-291 and SC21-724

The Florida Bar File Nos.  
2019-00, 462 (4A); 2020-00, 090 (4A)  
2020-00, 186 (4A); 2020-00, 272 (4A)  
2020-00, 291 (4A); 2020-00,322 (4A)  
2020-00, 339 (4A); 2021-00,158 (4A)  
2021-00, 363 (4A)

THE FLORIDA BAR,  
Complainant

VS.

DAVID ANDREW TAYLOR,  
Respondent

\_\_\_\_\_ /

**MOTION TO SEVER**

Comes now, Respondent, David Andrew Taylor, hereby files this Motion to Sever and as grounds for such states the following:

1. Herein are nine (9) complaints pertaining to nine (8) different complainants each with differing fact patterns, spanning twenty four months.
2. To compel Respondent to go to trial on all nine at once would be confiscatory of Counsel's time and would make it unfathomable to Respondent as to how he could tend to his daily professional and personal responsibilities.
3. Respondent's upcoming trial schedule alone consists of the following:

a. **June 2021**

i. **Coxwell-Personal Injury Case**

1. June 7<sup>th</sup>-Trial

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**ii. Dana Arthur-Trafficking-St. Johns County**

1. Trial would take place either June 14<sup>th</sup> or June 21<sup>st</sup>, but we will not know until June 9<sup>th</sup>.

**iii. Christian Anderson( Burglary of an Occupied Dwelling)-Duval County**

1. June 28, 2021

**b. July 2021**

**i. Sarah Law-Child Abuse Intentional Act-Columbia County**

1. July 12<sup>th</sup>-16<sup>th</sup>

**c. August 2021**

**i. William Wood-Conspiracy-Marion County**

1. August 3<sup>rd</sup> (Final pre-trial: Trial date to be determined at that hearing)

**d. October 2021**

**i. Christina Parker-Embezzlement-Duval County**

1. October 4<sup>th</sup>

**ii. Raejon Armstrong-Burglary and Grand Theft**

1. Jury Selection will either be October 1<sup>st</sup> or October 8<sup>th</sup>.  
Trial period will either be any day for a 2 week period beginning October 4<sup>th</sup>.

4. Pursuant to the Bar prosecutors most recent pleading styled "Possible Venue" (See attached "Exhibit A"), it is estimated that the trial of all eight complaints connected to Supreme Court Case No.: SC21-291 would take one (1) week. Previously, when the Bar filed this same document back in February, they advised that trial would take two (2) weeks. (See attached "Exhibit B") Respondent believes said estimate is grossly underestimated and that three to six weeks is more likely accurate. Respondent alone anticipates 30 plus witnesses. Additionally, many of the complaints stem from dissatisfied/ disgruntled criminal defense clients that are in custody :

- a. Shawn Morrow-Complainant in Florida Bar File No.:2020, 00 186 (4A) is currently incarcerated in the Duval County Jail with a pending case in which the Respondent and his family are the victim in said case.
  - b. Carlos Rivera-Complainant in Florida Bar File No.: 2020-00,090 (4A) is also currently incarcerated in the Duval County Jail with a pending criminal case that has a Pre-trial on June 30<sup>th</sup> and is set for a Final Pre-trial on September 15, 2021 and Jury Selection on September 20, 2021.
  - c. Scott Leland-Complainant in Florida Bar File No.: 2020-00,291 (4A) is currently incarcerated in the Florida Department of Corrections.
  - d. Ronald Lane-Complainant in Florida Bar File No.: 2020-00,322 (4A) is currently incarcerated in the Florida Department of Corrections.
  - e. Reginald Johnson-Complainant in Florida Bar File No.: 2019-00,462 (4A) is currently incarcerated in the Florida Department of Corrections.
  - f. Jawan Williams-Client in Complaint in Florida Bar File No.: 2020-00,339 (4A) is currently incarcerated in the Florida Department of Corrections.
5. As a matter of judicial economy would it not make more sense to have nine two-day trials than one two to six week trial?
  6. Respondent seriously doubts all nine trials would ever even be necessary, but rather speculates that after the first two or three acquittals the Bar will soften its stance dramatically towards respondent.

**WHEREFORE**, Respondent respectfully requests this Honorable Court to grant Respondent's Motion to Sever and prays this Court to enter a detailed order containing findings of fact.

**Respectfully submitted**, this 2nd day of June 2021.

s/ David A. Taylor  
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing was furnished via electronic service to trial counsel, James Keithy Fisher at [jfisher@floridabar.org](mailto:jfisher@floridabar.org) and staff counsel, Patricia Ann Toro Savitz at [psavitz@floridabar.org](mailto:psavitz@floridabar.org).

/s/ David A. Taylor  
David A. Taylor, Esq.

# EXHIBIT A



# EXHIBIT B

**POSSIBLE VENUE**

The Florida Bar v. David Andrew Taylor III

The Florida Bar File Nos. 2019-00,462(4A); 2020-00,090(4A); 2020-00,186(4A); 2020-00,272(4A); 2020-00,291(4A); 2020-00,322(4A); 2020-00,339(4A)

1. Residence: Duval County
2. Offense: Duval County
3. Office: Duval County

Other Pending Complaints – None

Estimated Trial time – Two Weeks