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PAGE 02

Board of Nursing
Petitioner

vs.

DOAH case no.00-1712
AHCA case no.97-19261

SFD

Debra Jurkovich
Respondent

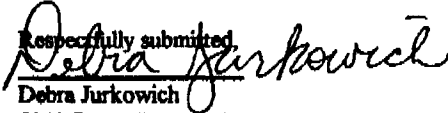
Motion to Suppress Evidence

Comes Now, the Respondent Debra Jurkovich,. Respondent would report the following:

1. The case is three plus years old .
2. Request for discovery has been formally requested as described by law and by procedure described by communications from the State/Board of Nursing.
3. Discovery was requested on three previous and separate occasions.
4. Rules of evidence requires discovery be disclosed timely upon request.
5. Rules of discovery require timely disclosure of all evidence.
6. No disclosure has occurred in the three years since first request for discovery.

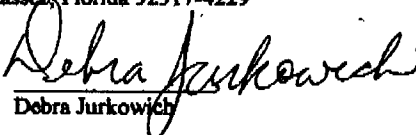
Where for the respondent respectfully requests that an order to suppress all evidence not disclosed timely.

Respectfully submitted,


Debra Jurkovich
7940 Sasser Lane
Pensacola, Fl. 32526

Certificate of Service

I hereby certify that a true and correct copy of the above motion was provided by certified mail this 18th day of December ,2000 to Michael E. Duclos, senior attorney, Florida Bar No. 274046, agency for Health Care Administration, Post office Box 14229, Tallahassee, Florida 32317-4229


Debra Jurkovich

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