

**IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT
IN AND FOR ALACHUA COUNTY, FLORIDA**

STATE OF FLORIDA,
Plaintiff,

CASE NO: 01-2023-CF-003404-A

v.

CHRISTOPHER JOHN BIVINS, JR,
Defendant.

MOTION TO MODIFY CONDITIONS OF PRE-TRIAL RELEASE

COMES NOW the Defendant, **CHRISTOPHER JOHN BIVINS, JR**, by and through his undersigned attorney, and moves this Honorable Court to modify the conditions of his pre-trial release and to lift “no contact” with the alleged victim, Jillian Renne Anderson, as a condition of pre-trial release in this case and the Defendant would show unto the Court as follows:

1. Mr. **BIVINS** was arrested on October 28th, 2023, in Alachua County and is currently charged with Burglary: With Assault or Battery, Battery: Commit Domestic Battery by Strangulation, Obstructing Justice- Intimidate Threaten Witness, Larc: Grand Theft 750 Less Than 5K Dols and Damage Prop- Crim Misch: Over 200 Dols Under 1000 Dd.
2. On October 30th, 2023, at First Appearance, Mr. **BIVINS** was ordered to refrain from contact of any type with the victim, [REDACTED].
3. Mr. **BIVINS** and Ms. [REDACTED] have an infant child together.
4. Undersigned counsel has explained to Ms. [REDACTED] that she needs to contact the State regarding her desire to lift the “no contact” order.
5. Ms. [REDACTED] informed undersigned counsel that she has requested many times to the State that the “no contact” order be lifted. However, the State has not followed through with these requests.
6. Subsequently, on behalf of Mr. **BIVENS** undersigned counsel is now requesting that the “no contact” order be lifted.

WHEREFORE, the Defendant, **CHRISTOPHER JOHN BIVINS, JR**, respectfully moves this Honorable Court to enter an order modifying the conditions of his pre-trial release and removing the “no contact” order with the alleged victim, [REDACTED]

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to Meredith Poisson, Assistant State Attorney, 120 West University Avenue, Gainesville, FL 32601 by Florida's E-Filing Portal this 15th day of March 2024.

MELDON LAW

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