

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

STATE OF FLORIDA

CASE NO: XX-XXXXXMUXXX

v.

T.N.

DIVISION: HON. XXXXX XXXXXXXX

**DEFENDANT'S MOTION TO WAIVE VEHICLE IMMOBILIZATION**

COMES NOW, Defendant, T.N., by and through her undersigned counsel and, pursuant to Florida Statute 316.193(6)(g), submits Defendant's Motion to Waive Vehicle Immobilization and in Support thereof would state as follows:

1. On April xx, 20xx, defendant entered a plea of "no contest" to a violation of Florida Statute 316.193(1);
2. The court adjudicated defendant guilty and sentenced defendant in accordance with Florida Statute 316.193(4);
3. An order of impoundment was issued by the court pursuant to Florida Statute 316.193(6)(a). The length of the impoundment is 10 days as this is a first offense;
4. The impoundment creates a substantial hardship for defendant and her family;
5. The defendant has four (4) minor children, who attend school. Defendant drops the children off at school in the morning and picks the children up in the afternoon;
6. Defendant's ex-husband, the children's father, is not able to take the children to and from school as he lives in another state ;
7. The children are not registered or eligible to ride the bus and are not of sufficient age and maturity to use public transportation;
8. Accordingly, the family of the owner of the vehicle has no other public or private transportation available to them.

WHEREFORE, Defendant, T.N., respectfully requests this honorable court issue an order waiving the ten (10) day vehicle immobilization and for such other and further relief as this

court may deem just and proper.

STATE OF FLORIDA  
COUNTY OF BROWARD

The foregoing instrument was acknowledged before me this \_\_\_\_ day of April, 20xx by T.N., who is personally known to me and who did take an oath.

\_\_\_\_\_  
T.N.

\_\_\_\_\_  
MY COMMISSION EXPIRES:

NOTARY PUBLIC

**Certificate of Service**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to the Office of the State Attorney by electronic delivery on April \_\_\_\_, 20xx.

Respectfully submitted,

The Law Offices of Michael A. Dye

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