

STATE OF INDIANA )  
 ) IN THE CARROLL CIRCUIT COURT  
 ) SS:  
COUNTY OF CARROLL ) CAUSE NO. 08C01-2210-MR-000001

STATE OF INDIANA )  
 )  
 v. ) **The Honorable Frances C. Gull,**  
 ) **Special Judge**  
RICHARD ALLEN )

**MOTION FOR SPECIFIC FINDINGS OF FACT AND CONCLUSIONS THEREON**

Defense counsel, Andrew Baldwin and Bradley Rozzi, by counsel David R. Hennessy, respectfully request that this Court issue findings of fact and conclusions thereon with respect to the contempt proceeding scheduled for hearing on March 18, 2024. In support of this Motion, defense counsel states the following:

1. Indiana Trial Rule 52(A) provides that, upon the written request of any party filed with the court prior to the admission of evidence in a case where issues are tried without a jury, the court “shall find the facts specially and state its conclusions thereon.”

WHEREFORE, Defense counsel, by counsel, respectfully requests that this Court issue findings of fact and conclusions thereon regarding the contempt proceeding scheduled for hearing on March 18, 2024.

Respectfully Submitted,

/s/David R. Hennessy

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served upon all counsels of record at the time of filing.

/s/ DAVID R. HENNESSY

**DAVID R. HENNESSY**

Attorney at Law  
11715 Fox Road  
Suite 400 #180  
Indianapolis, IN 46236  
(317) 636-6160  
Attorney No. 8216-49  
[hen@indylaw4all.com](mailto:hen@indylaw4all.com)