

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PASCO COUNTY, STATE OF FLORIDA
CRIMINAL FELONY DIVISION

STATE OF FLORIDA,
Plaintiff,

Case No: CRC14-000216-CFAES

vs.

Division: 1

CURTIS JUDSON REEVES,
Defendant.

_____ /

DEFENSE REQUEST FOR THE ATTENDANCE OF AN OUT-OF-STATE WITNESS

COMES NOW, Defendant, CURTIS JUDSON REEVES, by and through undersigned counsel, pursuant to Section 942.03, Florida Statutes and moves this Court for an order requesting that Fred Meyers be ordered to appear before the District Court, in and for the County of Pasco, State of Florida as a witness at the trial in the above-styled case, and as grounds therefore states as follows:

1. On January 13, 2014, Defendant was involved in a shooting that took place at the Cobb Grove 16 Cineplex in Wesley Chapel, Florida.
2. As a result, Defendant was charged with second-degree murder and aggravated battery with a firearm.
3. Defendant's trial in the above-styled case is currently set for February 7, 2022 through February 25, 2022.
4. Fred Meyers was the director of operations at the Cobb Grove 16 Cineplex movie theater at the time of the shooting.
5. Mr. Meyers is a material and necessary witness whose testimony is crucial to

understanding numerous policies and procedures of the movie theater at the time of the shooting, including testimony related to the surveillance equipment utilized by the theater. Further, Mr. Meyers' testimony is necessary as to Defendant's demeanor shortly before the shooting.

6. Mr. Meyers does not live in the state of Florida. Mr. Meyers is a resident of Georgia and lives at 4935 Brent Knoll Lane, Suwanee, Georgia 30024.

7. Mr. Meyers will be called as a witness on or about February 18, 2022 and will be required to travel from Atlanta, Georgia to Dade City, Florida, and back, requiring a maximum travel time of one (1) day, one way. The presence of Mr. Meyers as a witness will be required for a minimum of one (1) day, beginning on or about February 18, 2022.

8. The trial in this case is about to commence and Mr. Meyers' attendance will not cause an undue hardship if he is compelled to appear and testify in said Florida Court.

9. Payments of \$25.00 per day will be tendered as required by law to Fred Meyers on a daily basis if he is required to remain in Florida as a witness in this case for longer than one day. Reservations will be made for round-trip transportation from Atlanta, Georgia to Dade City, Florida. Transportation and lodging information will be forwarded to Fred Meyers.

WHEREFORE, Defendant respectfully requests this Honorable Court certify the above matters by issuing a certificate under the seal of the District Court of the State of Florida, in and for the County of Pasco, so that said certificate may be presented to a Judge of the State of Georgia, in and for the County of Forsyth, in a proceeding to compel Fred Meyers to be present in the State of Florida on February 17, 2022, to testify as a witness on or about February 18, 2022 at 8:30 a.m. and to remain until released by the Court; in accordance with the provisions of Section 942.03, Florida Statutes, Witness From Another State Summoned to Testify in This State.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic delivery to the Office of the State Attorney for the Sixth Judicial Circuit, c/o Glenn Martin, Esq. at glennmartin@flsa6.gov on this 19th day of January 2022.

/s/ Richard Escobar

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