

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
OF THE STATE OF FLORIDA IN AND FOR PASCO COUNTY

STATE OF FLORIDA,	:
Plaintiff,	:
	:
vs.	: Case No.
	: CRC14-00216 CFAES
CURTIS REEVES,	:
Defendant.	:
-----/	: -----/

CERTIFIED QUESTIONS

Whereupon by instruction of Counsel, Glenn L. Martin, Jr., Esquire, the following questions were certified during the deposition of **Vivian Reeves** taken October 15, 2015, commencing at 2:02 p.m. Present was Glenn L. Martin, Esquire, on behalf of State, and Dino Michaels, Esquire, on behalf of Defendant.

BY MR. MARTIN:

- Q. **He was wearing sneakers that day.**
- A. Yes.
- Q. **And these are Nike sneakers?**
- A. No.
- Q. **What are they?**
- A. Starts with an S, I don't know if it's Solomon.

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 Paula S. O'Neil
 Clerk & Comptroller
 Pasco County, Florida

Deposition testimony of Vivian Reeves

ORIGINAL

Is that a brand?

Q. **They were black, right?**

A. I don't know.

Q. **Okay.**

A. But I do know they have a reflective strip on them.

Q. **How do you know that?**

A. Because of the news.

Q. **Okay. Why did you think I was going to ask you about the reflective strip?**

A. Because his shoes have been such a big deal.

Q. **With who?**

A. I know that Mr. Escobar requested --

MR. MICHAELS: We're going to assert work product at this point.

MR. MARTIN: Certify the question.

(Whereupon the question was certified.)

MR. MICHAELS: I'm going to instruct the witness not to answer any questions about any conversations you've had with Mr. Escobar, myself, or anybody in our office.

MR. MARTIN: Well, let's go ahead and go

through that then. We'll get that out of the way.

BY MR. MARTIN:

Q. A couple days ago did you have a chance to meet with Mr. Escobar?

A. Yes.

Q. And what was the purpose of the meeting?

MR. MICHAELS: Work product.

MR. MARTIN: Certify the question.

(Whereupon the question was certified.)

BY MR. MARTIN:

Q. Did you have an opportunity to review the video?

A. Yes.

Q. Did you do that with Mr. Escobar?

A. Mr. Michaels.

Q. How many times did you view the video?

A. At least twice.

Q. All right. And during the time -- and what was the purpose of you viewing the video?

MR. MICHAELS: Work product.

MR. MARTIN: Certify the question.

(Whereupon the question was certified.)

Dated this 28th day of October, 2015.



KayLynn Boyer
Court Reporter
Boyer Court Reporting
(727) 455-5818