

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 **Matthew Reeves** taken October 15, 2015, commencing at 11:15 a.m. Present was Glenn L. Martin, Esquire, on behalf of State, and Dino Michaels, Esquire, on behalf of Defendant

FILED FOR RECORD
 PASCO COUNTY, FLORIDA
 2015 DEC - 8 AM 10:20
 Paula S. O'Neil
 Clerk & Comptroller
 Pasco County, Florida

BY MR. MARTIN:

Q. How many times have you watched that surveillance video?

A. I saw it at the bond hearing, I think I saw it on the internet once over a year and a half ago, back shortly after the bond hearing, and then once a couple days ago.

Q. Okay. And why did you look at it a couple days

Deposition testimony of Matthew Reeves

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ago? What were the circumstances to that?

A. The attorney showed it to me and just played it before they talked to me.

Q. And which attorney did you speak with?

A. Dino and Escobar.

Q. Okay. And where did that conversation take place?

A. I don't know that he was there, Escobar was there, at Escobar's office.

Q. And how long did that conversation take place?

A. I think I was there a half hour.

Q. And what was the purpose of the meeting, the 30 minute meeting with Mr. Escobar?

MR. MICHAELS: Work product objection.
I instruct him not to answer the question.

MR. MARTIN: Well, you're not his lawyer.

MR. MICHAELS: I understand. It's work product is the objection.

MR. MARTIN: You believe that's protected work product?

MR. MICHAELS: Yes.

MR. MARTIN: He's not your client.

MR. MICHAELS: I understand, and I believe it's protected work product.

MR. MARTIN: Okay. Well, and you're telling me that the purpose of the meeting is work product? I haven't got to the content yet. You're telling me the purpose of the meeting?

MR. MICHAELS: Yes.

MR. MARTIN: All right. Certify that question.

(Whereupon the question was certified.)

BY MR. MARTIN:

Q. What did Mr. Escobar tell you?

MR. MICHAELS: Again objection, work product, instruct the deponent not to answer the question.

BY MR. MARTIN:

Q. You're not going to answer the question?

A. No.

MR. MARTIN: All right. Certify the question.

(Whereupon the question was certified.)

BY MR. MARTIN:

Q. Have you hired Mr. Escobar as your attorney?

A. No.

Q. Okay. They don't represent you, correct?

A. No.

Q. And how long did -- many times did you watch this surveillance video during the meeting?

A. He went through it, I believe twice.

Q. And what comments did Mr. Escobar say to you when you were watching the video?

MR. MICHAELS: Work product, instruct the deponent not to answer the question.

MR. MARTIN: Certify it.

(Whereupon the question was certified.)

BY MR. MARTIN:

Q. As far as the face in that photograph, you didn't see anything to suggest any type of injury?

A. I didn't look at it.

Q. Didn't look at the face?

A. No.


Q. Okay. And why were you shown the picture of his hands?

MR. MICHAELS: Objection, instruct him
not to answer, work product.

MR. MARTIN: Certify the question.

(Whereupon the question was certified.)

Dated this 28th day of October, 2015.



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