

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: CRC1400216CFAES

vs.

CURTIS JUDSON REEVES,
Defendant.

Division: 1

Spn 00683538 /

DEFENDANT'S SECOND NOTICE OF RECIPROCAL DISCOVERY

COMES NOW the Defendant, CURTIS J. REEVES, in response to the State's Notice of Discovery and pursuant to Fla. R.Crim.P. 3.220(d) and 3.220(j), furnishes the following information:

1. Pursuant to Fla.R.Crim.P. 3.220(d)(1)(B), the following items are or will be available for inspection, copying, testing, and/or photographing:

A. Photographs from Knox & Associates, LLC from within the Cobb Grove Theater and at the Pasco County Sheriff's Office property section (to be made available to the State upon receipt by the Defense)

B. Photographs and videos from BEK TEK LLC derived from the Cobb Grove Theater surveillance system (The Defense has received preliminary videos and photographs derived from the surveillance system hard drives provided by the State. The Defense will make available, upon receipt, additional videos and photographs based on the recently imaged hard drives by eHounds of the Cobb Grove Theater surveillance system hard drives.)

C. Photographs taken during depositions

2. The Defendant does not believe that under the applicable court rules and case law that he is obligated to provide notice to the State of the items and materials provided to the Defense's experts. Nonetheless, in a show of good faith the Defendant voluntarily provides notice to the State that the following items and materials were made available to the below-listed Defense experts:

BEK TEK LLC

DVDs with four video clips (entered into evidence during bond hearing)

Hard drive with original video footage from the Cobb Grove Theater (provided by the State Attorney's Office to the Defense)

Cobb Grove 16 & CineBistro surveillance system hard drive and thumb drive inventory (provided by the State Attorney's Office to the Defense)

Report-Video Timeline (Agent Weyland) (provided by the State Attorney's Office to the Defense)

Mirrored hard drives of the Cobb Grove Theater surveillance system hard drives

Dr. Philip Hayden

Complete police reports and supplements (provided by the State Attorney's Office to the Defense)

All photographs provided by the State Attorney's Office to the Defense

Video footage of shooting (entered into evidence during bond hearing)

Reeves Tampa Police Department and Busch Gardens Personnel Files (entered into evidence during bond hearing)

Deposition Transcript of State's Witness Angela Hamilton (a copy can be obtained at the cost of \$3.00 per page from Independent Reporting Service - 418 E. Madison Street, Tampa FL 33602 ((813) 225-1666))

Deposition Transcript of State's Witness Anthony Colello (a copy can be obtained at the cost of \$3.00 per page from Independent Reporting Service - 418 E. Madison Street, Tampa FL 33602 ((813) 225-1666))

Deposition Transcript of State's Witness Elaine Ajamian (a copy can be obtained at the cost of \$3.00 per page from Independent Reporting Service - 418 E. Madison Street, Tampa FL 33602 ((813) 225-1666))

Deposition Transcript of State's Witness Garry Houston (a copy can be obtained at the cost of \$3.00 per page from Independent Reporting Service - 418 E. Madison Street, Tampa FL 33602 ((813) 225-1666))

Deposition Transcript of State's Witness Gladys Perez (a copy can be obtained at the cost of \$3.00 per page from Independent Reporting Service - 418 E. Madison Street,

Tampa FL 33602 ((813) 225-1666))

Deposition Transcript of State's Witness Luis Perez (a copy can be obtained at the cost of \$3.00 per page from Independent Reporting Service - 418 E. Madison Street, Tampa FL 33602 ((813) 225-1666))

Deposition Transcript of State's Witness May Houston (a copy can be obtained at the cost of \$3.00 per page from Independent Reporting Service - 418 E. Madison Street, Tampa FL 33602 ((813) 225-1666))

Deposition Transcript of State's Witness Robert Kerr (a copy can be obtained at the cost of \$3.00 per page from Independent Reporting Service - 418 E. Madison Street, Tampa FL 33602 ((813) 225-1666))

Deposition Transcript of State's Witness Sylvia Kerr (a copy can be obtained at the cost of \$3.00 per page from Independent Reporting Service - 418 E. Madison Street, Tampa FL 33602 ((813) 225-1666))

Deposition Transcript of State's Witness Vincent Redfern (a copy can be obtained at the cost of \$3.00 per page from Independent Reporting Service - 418 E. Madison Street, Tampa FL 33602 ((813) 225-1666))

Deposition Transcript of State's Witness Det. Alan Hamilton (a copy can be obtained at the cost of \$3.00 per page from Independent Reporting Service - 418 E. Madison Street, Tampa FL 33602 ((813) 225-1666))

Deposition Transcript of State's Witness Dep. Aaron Smith (a copy can be obtained at the cost of \$3.00 per page from Independent Reporting Service - 418 E. Madison Street, Tampa FL 33602 ((813) 225-1666))

Deposition Transcript of State's Witness Nicole Oulson (a copy can be obtained at the cost of \$3.00 per page from Independent Reporting Service - 418 E. Madison Street, Tampa FL 33602 ((813) 225-1666))

Deposition Transcript of State's Witness Det. Allen Proctor (a copy can be obtained at the cost of \$3.00 per page from Independent Reporting Service - 418 E. Madison Street, Tampa FL 33602 ((813) 225-1666))

Knox & Associates, LLC

Complete police reports and supplements (provided by the State Attorney's Office to the Defense)

All photographs provided by the State Attorney's Office to the Defense

Video footage of shooting (entered into evidence during bond hearing)

Architectural drawings of the interior of the Cobb Grove Theater (provided by the State Attorney's Office to the Defense)

Report-Video Timeline (Weyland) (provided by State Attorney's Office to the Defense)

Medical Examiner Case Report (provided by the State Attorney's Office to the Defense)

Ballistic report (provided by the State Attorney's Office to the Defense)

Deposition Transcript of State's Witness Angela Hamilton (a copy can be obtained at the cost of \$3.00 per page from Independent Reporting Service - 418 E. Madison Street, Tampa FL 33602 ((813) 225-1666))

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Deposition Transcript of State's Witness Nerida Abreu (a copy can be obtained at the cost of \$3.00 per page from Independent Reporting Service - 418 E. Madison Street, Tampa FL 33602 ((813) 225-1666))

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Deposition Transcript of State's Witness Vincent Redfern (a copy can be obtained at the cost of \$3.00 per page from Independent Reporting Service - 418 E. Madison Street, Tampa FL 33602 ((813) 225-1666))

Vernard I. Adams, M.D.

Photographs of Chad Oulson autopsy (provided by the State Attorney's Office to the Defense)

Medical Examiner's Case Report (provided by the State Attorney's Office to the Defense)


Chad Oulson medical records (provided by the State Attorney's Office to the Defense)

Photographs of Nicole Oulson (provided by the State Attorney's Office to the Defense)

Deposition Transcript of State's Witness Dr. Thogmartin (a copy can be obtained at the cost of \$3.00 per page from Independent Reporting Service - 418 E. Madison Street, Tampa FL 33602 ((813) 225-1666))

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via United States Postal Service and facsimile to the Office of the State Attorney for the Sixth Judicial Circuit, P.O. Box 5028, Clearwater, Florida 33758, this 6th day of October, 2015.


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