

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

STATE OF FLORIDA,  
Plaintiff,

Case No: CRC-1400216CFAES

vs.

CURTIS J. REEVES,  
Defendant.

Division: 1

spn 00683538

**MOTION TO PERMIT ENTRY ON PROPERTY**

Defendant, CURTIS J. REEVES, by and through the undersigned attorney and pursuant to Florida Rules of Criminal Procedure 3.220(f) hereby files this motion requesting that this Honorable Court issue an order permitting entry on property, and as good cause would show:

1. The alleged offense occurred at the Cobb Grove 16 Theater, 6333 Wesley Chapel, Florida just before the afternoon showing of the movie "Lone Survivor" on January 13, 2014.
2. To assist the defense in preparing a reconstruction of the alleged incident, it is necessary for defense experts to enter the property and take photographs, video, and measurements of the interior of the theater in question.
3. To assist the defense in fully understanding the alleged incident, it is necessary for defense experts to enter and view the interior of the theater.
4. At issue in this case is the condition of the lighting at the time of the alleged incident. To fully understand, and recreate, the lighting conditions at the time of the alleged incident, it is necessary for the defense and defense experts to enter the theater in question and view the different preset lighting settings for the theater in question,

which are known as “pre-show,” “trailer,” and “feature.”


5. All access shall be granted by the Cobb Theater in the morning before the Cobb Theater opens to the public and on days and at times agreed upon by the parties in advance.

Further, Defendant, CURTIS J. REEVES, has shared the contents of this Motion to Permit Entry on Property with the attorney for the Cobb Grove 16 Theater, Mr. Timothy D. Davis, Esq., who has indicated no objections to the motion.

WHEREFORE, the Defendant, CURTIS J. REEVES, respectfully requests this Honorable Court to enter an Order to Permit Entry on Property.

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Hand Delivery/Facsimile to the Office of the State Attorney, Dade City, and to the Cobb Grove 16 Theater, 6333 Wesley Grove Boulevard, Wesley Chapel, Florida 33544, Florida this 2nd day of October, 2014.

  
Dino M. Michaels, Esquire  
Escobar & Associates, P.A.  
2917 W. Kennedy Boulevard, Suite 100  
Tampa, Florida 33609  
Tel: (813) 875-5100  
Fax: (813) 877-6590  
Email: dmichaels@escobarlaw.com  
Florida Bar No. 0526290  
Attorney for Defendant

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

STATE OF FLORIDA,  
Plaintiff,

Case No: CRC-1400216CFAES

vs.

CURTIS J. REEVES,  
Defendant.

Division: 1

\_\_\_\_\_ /

**ORDER GRANTING MOTION TO PERMIT ENTRY ON PROPERTY**

THIS MATTER came before the Court for hearing on \_\_\_\_\_,  
2014, on Defendant, Curtis J. Reeves', Uncontested Motion to Permit Entry on Property. The Court,  
after considering the motion, the record, the court file, applicable law, and otherwise being fully  
advised in the premises, FINDS AND RULES as follows:

IT IS ORDERED that DEFENDANT'S UNCONTESTED MOTION TO PERMIT ENTRY  
ON PROPERTY is hereby GRANTED.

DONE AND ORDERED, in Dade City, Pasco County, Florida, this \_\_\_\_ day of  
\_\_\_\_\_, 2014.

\_\_\_\_\_  
PAT SIRACUSA  
Circuit Court Judge

**Confirmed Copies To:**

Office of the State Attorney  
Cobb Grove 16 Theater, 6333 Wesley Grove Boulevard, Wesley Chapel, Florida 33544  
Escobar & Associates, P.A., 2917 W. Kennedy Blvd., Suite 100, Tampa, Florida 33609