

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: F

MOTION FOR ISSUANCE OF SUBPOENA DUCES TECUM

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 issues an order allowing the issuance of a subpoena duces tecum or an order compelling discovery for the following evidence:

A. Any and all surveillance video footage of the interior of the theater showing the movie "Lone Survivor" and of all common areas of the Cobb Grove 16 Theater located at 6333 Wesley Grove Boulevard, Wesley Chapel, Florida, 33544 for the day of January 13, 2014 from opening of the business until closing. In support of the grounds therefore, Defendant, CURTIS J. REEVES would state as follows:

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. Although the alleged offense occurred in the theater itself, there are allegations that Mr. Reeves sought the assistance of management before the alleged offense occurred. This would have taken place in one of the

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common areas of the building.

3. It is necessary to have surveillance tape of the entire day to ascertain conditions prior to the alleged offense, to view the alleged offense itself, to observe Mr. Reeves' actions after the alleged offense, to see the arrest, and to properly investigate what actions were taken to preserve evidence and process the scene.
4. The State Attorney's Office has confirmed that the theater was equipped with a multi camera video surveillance system. Undersigned needs to be able to review said footage to properly prepare and present the defense on Mr. Reeves' behalf pursuant to rule 3.220 and as guaranteed by the 6th amendment of the U.S. constitution.
5. Undersigned counsel does not have access to the surveillance video footage, and therefore, needs an order of this court to obtain the same.

WHEREFORE, the Defendant, CURTIS J. REEVES, respectfully requests to issue an order directing the Clerk of the Circuit Court to issue a subpoena duces tecum to the Cobb Grove 16 Theater, 6333 Wesley Grove Boulevard, Wesley Chapel, Florida 33544 ordering that any and all surveillance video footage be provided to the defense.

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, Florida this 27th day of January, 2014.



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