

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-1400216FAES

vs.

CURTIS J. REEVES,
Defendant.

Division: 1

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 for the following evidence:

A. Any and all surveillance video footage of the theater playing the movie “The Hobbit: The Destruction Of Smaug” and all common areas of the Cobb Grove 16 Theater located at 6333 Wesley Grove Boulevard, Wesley Chapel, Florida 33544 taken on December 28, 2013 from opening until closing. In support of the grounds therefore Defendant CURTIS J. REEVES, would state as follows:

1. It is alleged that a Jamira Dixon had a confrontation with Mr. Reeves at the Cobb Grove 16, 6333 Wesley Grove Boulevard, Wesley Chapel, Florida 33544 before or during the showing of, “The Hobbit: The Destruction Of Smaug” on December 28, 2013.
2. Ms. Dixon alleged that the confrontation took place in the theater itself and continued outside of the theater in the common area of the building.


PAUL S. O'NEIL
Clerk & Comptroller
Pasco County, Florida
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3. 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.
3. 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 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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