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

STATE OF FLORIDA,
Plaintiff,

v.

CURTIS J. REEVES,
Defendant.
Spn 00683538 /

Case No.: CRC-1400216FAES

Division: 1

RESPONSE TO STATE'S MOTION TO COMPEL THE PRODUCTION OF STATEMENTS IN DEFENDANT'S POSSESSION OF WITNESSES DEFENDANT LISTED PURSUANT TO RULE 3.220(d)(1)(A)

COMES NOW, the Defendant, CURTIS J. REEVES, by and through Undersigned counsel, and responds to the State's Motion to Compel the Production of Statements in Defendant's Possession of Witnesses Defendant Listed Pursuant to Rule 3.220(d)(1)(A) ("State's Motion"), and as grounds therefore states as follows:

INTRODUCTION

No court in Florida has ever granted the relief requested in the State's Motion. The State puts forth the unprecedented claim that deposition testimony (in the form of a transcript) that was (i) fully known and heard by the prosecution (by virtue of an Assistant State Attorney's physical presence) and (ii) easily obtainable in printed form (by ordering a transcript from the court reporter) is subject to reciprocal discovery. This claim is unprecedented because it is patently meritless.

Further, if the State's request is granted, the deposition transcripts will be converted into public records and will be posted on the website designated by the Clerk of Court for this case.

These thousands of deposition transcript pages contain countless questions of, and answers from, prospective trial witnesses.

The compelled disclosure of the deposition transcripts in a high-profile criminal prosecution will undoubtedly cause a wholly unpredictable and potentially devastating chain reaction of media coverage. These deposition transcripts contain prejudicial, inadmissible, inflammatory, irrelevant, inaccurate, unreliable, and demonstrably incorrect and false statements. There is no realistic possibility that the news media will refrain from publicizing many of these types of disclosures. Inevitably, prospective Pasco County jurors will be reading, watching, listening to, and viewing news coverage that is prejudicial to Mr. Reeves.

Additional prejudicial news coverage in the months leading up to the trial may cause actual and irreparable harm to Mr. Reeves' ability to select an impartial jury in Pasco County. If this occurs, Mr. Reeves will have no remedy to correct the harm from the filing of the deposition transcripts.

This Court should therefore deny the State's Motion. It is both without merit and the requested relief will cause irreparable harm to Mr. Reeves' constitutional right to have a fair trial with an impartial and qualified jury in Pasco County.

FACTUAL AND PROCEDURAL BACKGROUND

1. The State and the Defense have, to date, conducted approximately 150 depositions in this case.
2. The procedure for scheduling the depositions, as well as the manner in which they were conducted, were equally fair to both parties.
3. The State and the Defense coordinated the scheduling of the depositions. Both parties had advance notice of the names of the witness(es) to be deposed as well as the date, time and place of when/where it was to be conducted.

4. During each and every deposition, one or more Assistant State Attorney(s) and one or more attorneys from Defense met in a designated room with a court reporter and the witness to be deposed.
5. During each and every deposition, both the State and the Defense had an equal opportunity to both ask questions and hear the answers of the deposed witness. It is clear that both parties received the deposed witnesses' testimony simultaneously, as they were in the same room.
6. Both the State and the Defense also took notes of the witnesses' testimony. Undersigned counsel is aware that the Assistant State Attorneys that have attended the depositions routinely took copious notes.
7. Further, during all of the depositions both the State and the Defense had an opportunity to audio-record the witnesses' testimony. Undersigned counsel is also aware that the State has availed itself of the opportunity to audio-record the testimony of some of the deposed witnesses.
8. After the deposition, both the State and the Defense have also had a full and equal opportunity to request transcription of any (or all) of the depositions. The process for obtaining a copy of a deposition transcript is the same for both parties. The court reporter is contacted, a request for one or more transcripts is submitted, and a reasonable per-page fee is rendered to said court reporter in exchange for a copy of the deposition transcript.
9. Despite the equally fair procedures described above, starting in August 2015 and continuing to the present, the State has repeatedly attempted to obtain copies of the Defense's deposition transcripts without paying a reasonable fee to the court reporter. Instead, the State has filed a flurry of motions requesting compelled disclosure and/or the filing of the defenses' deposition transcripts with the clerk of court.

10. **First**, on August 5, 2015 the State filed a motion to compel filing of the transcripts. After a number of court appearances, the preparation of multiple pleadings, and extensive litigation to the Second District Court of Appeal, and Chief Judge Rondolino. On May 19, 2016, Chief Judge Rondolino held that the Defendant would not be required to file his privately obtained deposition transcripts with the Clerk of the Court. Chief Judge Rondolino noted that:

> It seems like we've spent an[ ] awful lot of court time and an awful lot of money when if the issue is obtaining the information so that both sides under our rules of discovery are equally armed, that's not the issue. So it must be a money issue, or it must be some other issue that is an attempt by one side to transform the documents in this case into some sort of public record through the mechanism of having those filed in the court files. *May 19, 2016 Transcript*, at 14.

Chief Judge Rondolino further commented that:

> I'm struggling with why in the world we're in the business – the Court would be in the business, me, of entering an order which impinges upon the private enterprise of court reporting simply because we want to load the clerk up with a bunch more paper to scan and put in the court files and give everybody else a free download of the court reporter's work product. I'm not getting it. I just don't see a reason for this to continue. *May 19, 2016 Transcript*, at 39.

11. In relation to the Defense's position that the filing of the deposition transcripts would (i) render them public records, (ii) make them publicly accessible for download from the webpage established by the Clerk of Court, and (iii) place Defendant's right to a fair trial in imminent danger, The Chief Judge of this Circuit stated that:

> When the Court says, my goodness, you know, here we got – there's no compelling reason to put all of this stuff [i.e. the deposition transcripts] out in the public that might cause a problem under *Palm Beach* [*Newspapers Inc. v. Burk*, 504 So. 2d 378 (1987)] or cause a problem with venue and jury selection and all that. Why would I want to buy a problem in the case? Why wouldn't I just say let's avoid it in a very high profile important case? What would be the argument to say, No, Judge, here's why you want to go forward with that? *May 19, 2016 Transcript*, at 43.

12. **Second**, on October 16, 2015 the State filed a number of motions requesting an order that, among other things, would compel the Defense to provide to the prosecution the deposition transcripts read by various Defense experts. These experts included (i) Vernard I. Adams, M.D., (ii) Michael Knox, (iii) Dr. Philip Hayden, and (iv) Bruce Koenig.

13. In the Responses filed in opposition to each of the State's October 2015 motions, the Defense stated that:

> It is utterly remarkable that given the circumstances of this case, the State claims that the interests of justice compel the Defendant to produce copies of deposition transcripts to the prosecution. First, the aforementioned individuals are prosecution witnesses. Second, a prosecutor (taking extensive notes) was present at every deposition of every state witness. Third, in his October 6, 2015 Defendant's Second Notice of Reciprocal Discovery, undersigned counsel gratuitously both advised the State that Dr. Hayden was provided a copy of the relevant deposition transcripts and provided the contact information of the court reporter, from whom they can order a copy of the transcript at a reasonable rate. *See, e.g. Defendant's Response to State's Motion to Compel Additional Discovery Relating to Defense Expert Dr. Philip Hayden.*, at 10.

14. This Court, after conducting a hearing on the State's October 2015 Motions, denied the prosecution's request for the Defense to provide copies of the deposition transcripts which were provided to the four above-listed experts.

15. **Now**, in its latest attempt to obtain free or low cost access to the Defense's deposition transcripts, the State alleges that "defense discovery deposition transcripts are a 'statement' of any person listed in subdivision [of Rule of Criminal Procedure 3.220(d)(1)(A)], and subject to reciprocal discovery to the prosecution." *State's Motion*, ¶ 7.

16. Further, the State contends that:

> "the defense discovery deposition transcripts are 'any tangible papers or objects' that the defendant intends to use in the hearing [citing Fla. R Crim. P. 3.220(d)(1)(B)(iii)]. The depositions taken pursuant to Rule 3.220 may be used by any party for the purpose of contradicting or impeaching the testimony of the deponent as a witness. [ ] Also[,] depositions can be used to refresh the memory of a witness." *State's Motion*, ¶ 9.

17. The State ultimately (and remarkably) contends that because the Defense failed to allow the State to inspect, copy, test or photograph the deposition transcripts, it is in violation of the discovery rules. *State's Motion*, ¶ 10. This, in spite of the very fact that the prosecution has already received the testimony while they were present at the deposition itself.

18. In its Memorandum in Support of State's Motion to Compel the Production of Statements in Defendant's Possession of Witnesses Defendant Liste [sic] Pursuant to Rule 3.220(d)(1)(A), the State also cites to two cases: *Kidder v. State*, 117 So. 3d 1166 (Fla. 2d DCA 2013) and *Scipio v. State*, 928 So. 2d 1138 (Fla. 2006). As explained below, these cases support the *Defense's* position that transcripts of depositions that were, among other things, attended by a representative of the State are not subject to reciprocal discovery.

19. The State's arguments in support of its request for access to the Defendant's deposition transcripts do not and cannot survive a basic factual and legal critique.

MEMORANDUM OF LAW

The State is asking this Court to interpret the terms "statement" and "tangible paper or objects" in a manner that contradicts the true spirit and objectives of the discovery rules.

The rules of discovery are intended to avoid "surprise" and "trial by ambush." *Scipio v. State*, 928 So. 2d 1138, 1144 (Fla. 2006) (citation omitted). The Florida Supreme Court has commented that "relevant facts should be the determining factor [at trial,] rather than gamesmanship, surprise, or superior trial tactics." *Id.* at 1144 (citation omitted). The rules of discovery are therefore intended to "facilitate a truthful fact-finding process." *Id.* (citation omitted).

Accordingly, if one party has possession of a "statement" of a listed witness that is not known to the other party, the rules of discovery compels the disclosure of said statement. On the

other hand, if both parties have the ability to both receive the statement and later obtain a transcription of it, then the rules of discovery do not compel any type of disclosure. After all, it is self-evident that a party cannot be ambushed or surprised if they have *the exact same information as their opponent.*

Deposition transcripts are not "statements" under Fla. R. Crim. P. 3.220(d)(1)(B)

The term "statement" under the rules of discovery includes "a written statement made by the person and signed or otherwise adopted or approved by the person and also includes any statement of any kind or manner made by the person and written or recorded or summarized in any writing or recording…." Fla. R. Crim. P. 3.220(b)(1)(B). The term "statement of any kind or manner" has been interpreted to include, for example, oral statements from a prosecution witness to a representative of the State. *See Scipio*, at 1140-41, 1144-46; *Bell v. State*, 930 So. 2d 779, 784-788 (Fla. 4th DCA 2006).

The appellate cases that address discovery violations provide an explanation for why deposition transcripts are not subject to reciprocal discovery. In these cases, one party (usually the defendant) alleges that the State failed to disclose discoverable information (like "statements") that were *unknown* to the defense. For example, in *Scipio*, *State's Memorandum*, at 4, the Florida Supreme Court reversed a criminal conviction based on the prosecution's failure to disclose that a witness for the State had materially altered his story.

In *Scipio*, the State contended that the defendant shot and killed a man. An investigator from the Medical Examiner's Office viewed photographs taken of the victim's body at the scene of the crime. At a deposition, the investigator testified that he saw a crime scene photograph depicting a semi-automatic pistol under the victim's body. Defense counsel initially intended on using the investigator's belief that a firearm was under the victim's body to raise reasonable doubt as to whether his client was the assailant.

On the day of trial, Scipio's defense counsel's requested the investigator review his deposition transcript. The investigator complied with the request and subsequently stated to defense counsel that he was still in agreement with his prior testimony.

Unbeknownst to Scipio's counsel, that same investigator later met with a prosecutor before trial started. At this meeting, the investigator again viewed the previously referenced crime scene photo. At that point the investigator determined that said photo did not reveal a firearm underneath the victim, but rather a pager. The investigator therefore realized that his deposition testimony on that point was incorrect - and he disclosed this realization to the prosecutor. The State, however, did not disclose this information to defense counsel prior to the commencement of trial.

During questioning of the investigator, defense counsel first learned of the investigator's new statement that the crime scene photo depicted a pager, and not a firearm, underneath the victim's body. Defense counsel was surprised by the in-trial disclosure. Defense counsel moved for a mistrial based on a discovery violation, but his motion was denied and the defendant was later convicted.

On review, the Florida Supreme Court held that the State's failure to disclose the investigator's materially different oral statement to the prosecutor to Defense counsel constituted a discovery violation. *Scipio*, at 1142-43. In support of its ruling, the Scipio court cited to a number of cases where the prosecution failed to disclose a material statement to the defense. *Id.* at 1143 (listing cases). The common factual feature in all of these aforementioned cases is that the defense was kept in the dark regarding the existence of a statement that otherwise had to be disclosed pursuant to the rules of discovery. The prosecution's failure to disclose the relevant information to the defense violated the rules of discovery.[1]

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1 The Florida Supreme Court did not hold that the prosecution's disclosure to defense counsel had to be in any particular format. Rather, it cited its previous ruling in *State v. Evans*, 770 So. 2d

Notably, the Scipio case referenced that the defense attorney had requested permission to meet with the prosecutor and the investigator. The prosecutor had rejected the defense attorney's request. Had defense counsel been allowed to attend the meeting between the prosecutor and the investigator, the outcome of the case would have been different. This is because in this alternate circumstance the defense attorney would have had full knowledge of the investigator's disavowal of his previous testimony. In such a situation, Scipio's attorney would not have been able to say he was "surprised" mid-trial.

Similarly, the other case to which the State cites – *Kidder v. State* – shares a common feature with *Scipio*, in that one party had possession of discoverable material, and the other did not. 117 So. 3d at 1168-70. *Kidder* involved a DUI manslaughter prosecution. 1168-69. The FDLE had analyzed a blood sample of Kidder and determined that its BAC was 0.196 percent. 1169. Kidder's defense counsel thereafter filed a motion to send a second blood sample to a different laboratory for testing. *Id.* The motion was granted, the second sample was sent and tested, and a report was generated. *Id.* Said report was not provided to the State, and was solely accessible to the Defense.

The State later moved to compel the defense to provide a copy of the blood test results from the second laboratory. *Id.* Kidder opposed the State's motion and alleged that the said report constituted work product that is not subject to disclosure. The trial court granted the State's motion, and Kidder pursued certiorari review. The Second District Court of Appeals interpreted the language of the applicable discovery rule (Fla. R. Crim. P. 3.220(d)(1)(B)(ii)) and denied Kidder's petition.

1174 (Fla. 2000) wherein it had held that the State must disclose the "substance" of a witnesses' materially different statement. *Scipio*, at 1143.

Kidder clearly supports the Defense's position. In *Kidder*, the second sample was tested without a State expert being either present or otherwise privy to the outcome of the scientific examination. Likewise, the State had no apparent means to obtain a copy of the test results.

In sharp contrast to the facts and circumstances in *Kidder*, in this case a representative of the State attended each and every deposition. The Assistant State Attorney(s) attending the depositions heard the exact same witness testimony (*simultaneously*) with the attorney(s) for the Defense. In addition, the State had, and fully exercised, its ability to take notes of the witnesses' testimony. The State has availed itself of the opportunity to audio-record some of the deposed witnesses' testimony. Further, the State can order the deposition transcripts directly from the court reporter. In simplest terms, the State already has what it is requesting from the Defense - that is, the testimony of the witnesses in depositions.

Given all of the above, it is abundantly clear that deposition transcripts are not "statements" under the discovery rule. Still, there is yet another reason why the State's claim is meritless. Under the State's flawed reasoning, because the deposition was audio-recorded and/or memorialized (in type) by the attending court reporter and/or the Assistant State Attorney, the *prosecution* would also have a legal obligation to provide the Defense with inspection, copying, and photographing rights to the deposition transcripts. Of course, such an interpretation would lead to the absurd result of both the State and Defense in every case alleging that deposition transcripts must be exchanged pursuant to the discovery rules. Just imagine the negative impact such a ruling would have on our criminal justice system throughout the State of Florida.

For these reasons, the State's Motion should be denied.

Deposition transcripts are not "tangible papers or objects" under Fla. R. Crim. P. 3.220(d)(1)(B)

Similarly, the State's claim that deposition transcripts are "tangible papers or objects" is also without merit. Both the State and the Defense were present at depositions. Both parties had an equal and fair opportunity to (1) ask questions, (2) listen to the witnesses' answers, (3) take notes, (4) audio-record the deposition transcript, and (5) order a transcript of the deposition. Accordingly, the transcription of the deposed witnesses statement cannot be considered "tangible papers," despite the fact that they are "tangible" and in "paper" form.

Additionally, the State misconstrues an important legal principle. The rule in the Second District Court of Appeal is that "a deposition is not required to be filed with the court in order for the deposition to be used for impeachment purposes." *Smith v. State*, 594 So. 2d 846, 847 (Fla. 2d DCA 1992) (*citing Williams v. State*, 472 So. 2d 1350 (Fla. 2d DCA 1985). The State cannot therefore legitimately contend that the deposition transcripts must be filed before any future hearing and/or trial.

This Court should therefore deny the State's Motion on this alternate ground.

The disclosure of the deposition transcripts will cause irreparable harm to Defendant's constitutional rights

If the State's Motion is granted, public access to all of the deposition transcripts will be imminently dangerous to Mr. Reeves' ability to select an impartial jury in Pasco County. Any filed deposition transcripts will attain the status of a public record and be available for publication and access on www.curtisreevestrial.com. *Florida Freedom Newspapers, Inc. v. McCrary*, 520 So. 2d 32, 35 (Fla. 1988); *see also Lewis v. State*, 958 So. 2d 1027, 1028 (Fla. 5th DCA 2007) ("transcripts fit within the broad definition of 'public records' found in section 119.011 (11)").

A defendant in a criminal case has a constitutional right to an impartial trial by jury. *Singer v. United States*, 380 U.S. 24, 36 (1965). Pretrial media coverage can serve to undermine the

defendant's right and ability to select an impartial jury. *Sheppard v. Maxwell*, 384 U.S. 333, 360 (1966). This is because a community can become "so infected by knowledge of the incident and accompanying prejudice, bias, and pre-conceived opinions that jurors could not possibly put these matters out of their minds and try the case solely on the evidence presented in the courtroom." *Manning v. State*, 378 So. 2d 274, 276 (Fla. 1979). In particular, pretrial publicity close in time to jury selection can undermine a defendant's right to a fair trial. *Patton v. Yount*, 467 U.S. 1025, 1034-1035 (1984).

Here, Mr. Reeves has a number of serious concerns regarding any pretrial media coverage of the disclosures contained within the dozens of deposition transcripts. In this case, the media has already mischaracterized information in a way that prejudices Mr. Reeves. Additional mischaracterizations could result in further prejudice. The dozens of Defense deposition transcripts contain substantial amounts of prejudicial, inadmissible, and outright false statements.

The Florida Supreme Court, which has broadly considered the above concerns, has held that a defendant's right to a fair trial is more important than the right of the public to access criminal deposition transcripts before trial. *Palm Beach Newspapers, Inc.* v. *Burk*, 504 So. 2d 378, 379 (Fla. 1987). In ruling that the press does not have a right to pretrial discovery depositions in criminal cases *which have not been filed*, the Supreme Court engaged in a thorough discussion on the competing interests between public access to pretrial deposition transcripts in criminal cases and the rights of defendants to have fair trials. The *Palm Beach Newspapers* Court opined that:

> [t]he question of public access to pretrial criminal proceedings directly implicates a variety of constitutional rights: the due process right to a fair trial under the fifth and fourteenth amendments; the rights to a speedy and public trial by an impartial jury in the venue where the crime was allegedly committed under the sixth amendment; the rights of the public and press under the first amendment; and the privacy rights of the accused and other trial participants under the first amendment and article I, section 23 of the Florida Constitution. It also implicates the state's interest in inhibiting disclosure of sensitive information and the right of the public

> to a judicial system which effectively and speedily prosecutes criminal activities. It is the balance between these rights which is at issue. *Id.* at 379-280.

After performing the appropriate legal balancing test, the *Palm Beach Newspapers* Court relied upon *Seattle Times Co. v. Rhinehart*, 467 U.S. 20 (1984) and held that the right of a defendant to have a fair trial is clearly more important than the press's interest in having the pretrial ability to obtain copies of depositions which are not filed with the court. *Id.* at 382. The Florida Supreme Court summarized *Seattle Times Co.* as follows:

> [t]he discovery rights of parties under modern practice is very broad. Discovery may be had on any nonprivileged matter which is relevant to the subject matter of the pending action. It is not limited to evidence which will be admissible at trial so long as the information sought is reasonably calculated to lead to the discovery of admissible evidence. There is no distinction drawn between private information and that to which no privacy interests attach. Discovery rules permit extensive intrusion into the affairs of both parties and non-parties and discovery may be judicially compelled. Liberal discovery produces information which may be irrelevant to the trial and which, if publicly released, would be damaging to the reputation and privacy of both parties and non-parties. The parties are granted discovery rights as a matter of legislative or judicial grace. Non-parties do not possess discovery rights and cannot compel the disclosure of information. There is no independent right outside the trial process to the information sought**. Society in general, and the courts specifically, has a substantial interest in preventing abuse of judicially compelled discovery. Deposition proceedings are not public components of a trial unless made so by the parties. Such proceedings were not open to the public at common law and, as a matter of modern practice, are normally conducted in private. Thus, restrictions on discovered information which has not been admitted at trial are not restrictions on a traditionally public source of information.** *Palm Beach Newspapers, Inc.*, 504 So.2d at 382 (emphasis added).

The *Palm Beach Newspapers* Court proceeded to caution that the harm from pretrial public access to criminal deposition transcripts could not be properly remedied or avoided with protective orders. *Id.* at 383. This is because pretrial access to criminal deposition transcripts:

> present[ ] unacceptable hazards to other constitutional rights because of uncertainty as to the nature and content of the information. **The purpose of depositions is to develop evidence by discovering what potential witnesses may know about the subject of the trial. It is not possible beforehand to know with any degree of certainty what information will be discovered.** In this respect, a deposition proceeding is unlike a pretrial suppression hearing or a preliminary hearing on

> probable cause where the parties and the court know beforehand what will be discussed. Thus, it is not feasible for a potential witness, for example, to seek a protective order in advance of the deposition and it is too late to do so if the information becomes public knowledge. **The often irrelevant and inadmissible evidence discovered during a deposition has the substantial potential of hazarding the right to a fair trial, the privacy rights of both parties and non-parties, and the right to a trial in the venue of the alleged crime**. Aside from the impracticability of seeking protective orders beforehand, seeking such orders "would necessitate burdensome evidentiary findings and could lead to time consuming interlocutory appeals." [citation omitted]. The effect such a procedure would have on the speedy trial rights of the accused and public is obvious. **Moreover, [pretrial access to criminal deposition transcripts] would not serve the purpose of criminal discovery — assisting in the trial or resolution of criminal charges — and would carry us even farther from the central aim of a criminal trial — trying the accused fairly.** *Id.* at 383. (emphasis added).

The Florida Supreme Court's aforementioned concerns illuminate the serious and imminent risks of irreparable harm to Mr. Reeves in this case. This Court has already acknowledged and held that this case has been the subject of extensive press coverage. *Reeves*, 141 So. 3d at 777. Media outlets in the Sixth Judicial Circuit, Florida, nationwide, and around the world have written, discussed, analyzed and opined on this case. It is unfortunately safe to anticipate that during any future jury selection, Mr. Reeves, the State, and the trial court will have to engage in a uniquely detailed and thorough process to ensure that a fair and impartial jury will be chosen. The end result of the disclosure of all of the deposition transcripts may result in Mr. Reeves being *unable* to select a fair and impartial jury in Pasco County.

The Florida Supreme Court has unambiguously held that protecting defendants from experiencing the prejudice that may stem from pretrial disclosure of deposition transcripts is a crucial concern compelled by the Florida Constitution. *Palm Beach Newspapers, Inc.*, at 383; *See also Lewis*, 958 So. 2d at 1028.

For this alternate reason, the Court should deny the State's Motion.

WHEREFORE, the Defendant, CURTIS J. REEVES, respectfully requests this Honorable Court to DENY the State's Motion.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing will be furnished by Hand Delivery to ASA Glenn Martin, Office of the State Attorney, Clearwater, Florida this 23rd day of September 2016. .

[redacted]

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