IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
OF THE STATE OF FLORIDA IN AND FOR PASCO COUNTY
CRC14-00216CFAES

STATE OF FLORIDA

V.

CURTIS J. REEVES

**STATE'S MOTION TO COMPEL THE PRODUCTION
OF MATERIAL IDENTIFIED BY BRUCE KOENIG DURING
HIS DEPOSITION THAT ARE AVAILABLE FOR REVIEW BY THE STATE**

COMES NOW, BERNIE McCABE, State Attorney for the Sixth Judicial Circuit in and for Pasco County, Florida, by and through the undersigned Assistant State Attorney, hereby respectfully request this Honorable Court to enter an order compelling the Defendant to immediately provide to the State copies of information and materials, Bruce Koenig identified during his deposition that are available for review by the State and as good cause would show:

1. The State took the deposition of defense expert Mr. Bruce Koenig on March 29, 2016.

2. During the deposition, Mr. Koenig identified various documents / videos / photographs that are available for review by the State.   Mr. Koenig identified Q6 as the data source containing .avi files from cameras #11 & #12 from which was made a video presentation(s) in QuickTime MOV format, consisting of two times resize images of pertinent area(s), lighten the shadow or dark areas of the scene, adjusted the contrast and sharpened it, and in areas where there was no images, a countdown in "black" in areas where there was no recording so the individual images would be spaced correctly. The video presentation was electronically sent to the defense in a zip file on November 20,2015 (Deposition: pages 126 – 140 & 161, attached)

3. Mr. Koenig stated he took photographs of cameras #11 & #12 inside theater #10. (Deposition: page 149, attached)

4. Also, Mr. Koenig identified Q3 (as) "side-by-side image comparison and all of them are 4x resize, in parentheses, and then the first one is cropped, designated region marked, the second one is cropped, enhanced as designated region marked; next one is designated region marked; and the last one is enhanced regions marked, all bitmap images. (Deposition: page 157, attached)

5. Mr. Koenig also identified two zip files he sent to the defense. The first one was sent on October 12, 2016 containing 41 bitmaps. The second one was sent on October 13, 2016 containing 11 bitmaps depicting various enhanced images of theater #10, left side

(Deposition: pages 160-161, attached)

6. On August 2, 2016 a letter requesting the below-described material was mailed to Bruce Koenig and defense counsel. The State requested the material by Friday, August 26, 2016. For Mr. Koenig's convenience, the State attached a blank DVD-R for the requested videos and bitmap material

7. As of September 6, 2016 the State has not received the requested material.

8. The State is requesting copies of the documents identified by Mr. Koenig:

   • Copy of the enhance video presentation described above made from the data of Q6, consisting of a series of .avi file electronically sent to the defense depicting video surveillance from cameras #11 & #12 from the time Mr. & Mrs. Reeves enter theater #10 until the shooting event.
   • Photographs taken of cameras #11 & #12 inside theater #10
   • Marked, cropped and resized bitmap images made from the date of Q3.
   • Bitmap images sent to the defense on October 12 & 13, 2016.

WHEREFORE, the State respectfully requests this Honorable Court to enter an order directing the Defendant, through defense counsel, to immediately provide the State with the above-described material.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the State's Motion To Compel The Production of Material Identified By Bruce Koenig During His Deposition That Are Available For Review By The State was furnished to Richard Escobar, Esq., Escobar & Associates, P.A., 2917 West Kennedy Blvd., Ste 100, Tampa, FL 33609, Attorney for the Defendant by U.S. Mail / Hand / Facsimile this _____ day of September, 2016.

BERNIE McCABE, State Attorney
Sixth Judicial Circuit of Florida

Glenn L. Martin, Jr.
Assistant State Attorney

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

STATE OF FLORIDA,
        Plaintiff,

vs.

CURTIS JUDSON REEVES,
        Defendant.

_____/

Case No: CRC1400216CFAES

Division: 1

DEFENDANT'S THIRD NOTICE OF RECIPROCAL DISCOVERY

COMES NOW the Defendant, CURTIS J. REEVES, in response to the State's written Notice of Discovery and pursuant to Fla. R.Crim.P. 3220(d), furnishes the following information:

1.   Pursuant to Fla.R.Crim.P. 3220(d)(1)(b), below is a list of the information and material within the Defendant's possession or control which will be produced for the State to inspect, copy, test, and/or photograph:

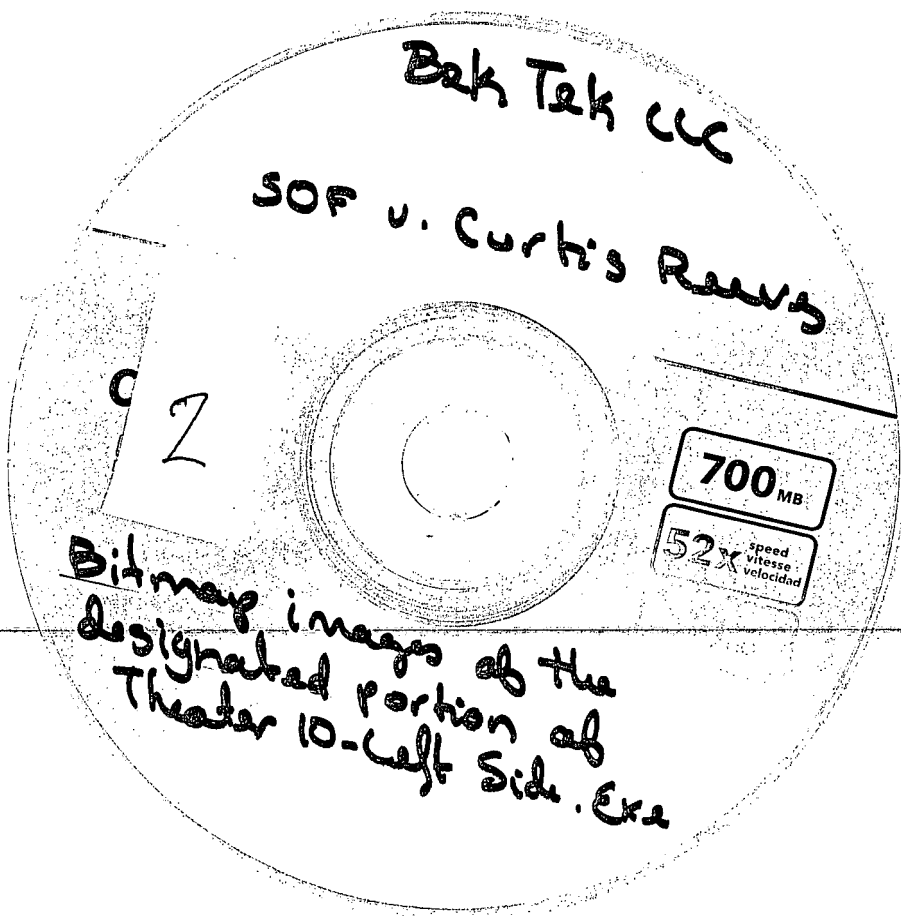   A.   Tangible papers or objects: **Bek Tek Videos (3 CDs)**

                                                Movie Ticket

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via hand delivery to the Office of the State Attorney, 38053 Live Oak Avenue, Dade City FL 33523, this 18th day of November, 2015.

RICHARD ESCOBAR, Esquire
Escobar & Associates, P.A.
2917 W. Kennedy Boulevard, Ste 100
Tampa, Florida 33609
Tel: (813) 875-5100
Fax: (813) 877-6590
Email: rescobar@escobarlaw.com
Florida Bar Number: 375179
Attorney for Defendant

BEK TEK LLC

SOF v. Curtis Raws

1 on

DVD-R | 16x
4.7GB, 2 hr

Direct, enhanced, magnified &
speed-adjusted video copies
of designated portions of
Theater 10-Left-Side.exe

Bek Tek LLC

SOF v. Curtis Raws

2

700 MB

52x speed
vitesse
velocidad

Bitmap images of the
designated portion of
Theater 10-Left Side.exe

BEK TEK LLC

SOF v. Curtis Reeves

DVD-R/16x
4.7GB, 2 hr

DVD

3 n

One-minute loops of enhanced/
magnified
"Theater 10-Left side. Ex."

DEPOSITION EXCERPTS

1 didn't bring all --

2   Q   I asked you to come here prepared. Are you

3 prepared for this depo?

4   A   I was not told to bring anything.

5   Q   I didn't ask what you were brought here; I

6 asked if you prepared. You indicated that you reviewed

7 all your notes and you spent about an hour doing it.

8 Are you prepared to answer the questions during this

9 depo?

10   A   I can tell you what the -- UPS Next Day Air.

11 Since we don't say where it came from, I presume it

12 came from attorney Escobar and Michaels' office.

13   Q   Are you familiar with the work that E-Hounds

14 did in this particular case as far as copying or

15 cloning, whatever you will, the hard drives?

16   A   It might be other materials we have but we

17 wouldn't care about that in the sense of our work

18 here.

19   Q   Do any of your notes, anywhere, your memory,

20 anywhere, indicate that you received anything from the

21 company E-Hounds out of Clearwater, Florida?

22   A   E-Hounds?

1   Q   Adam Sharp.

2   A   Yeah, we received what would be the last one

3 I listed, what I call my Q6.

4   Q   All right. So doing my analysis, if the last

5 one is Q6, the one we're talking about you received on

6 7/3/2014 is Q3.

7   A   That's correct.

8   Q   And the other two we talked about, may I

9 assume that's Q1 and Q2?

10   A   Yes.

11   Q   And, again, following that same sequence,

12 the PDF regarding the security equipment, that would be

13 Q4?

14   A   Oh, whoa, whoa. No, the thumb drive, the

15 PNY, is Q4.

16   Q   Which one?

17   A   The PNY thumb drive, PNY 128 --

18   Q   Oh, you didn't do a Q3A and 3B since you

19 received it the same --

20   A   No.

21   Q   Okay.

22   A   Each one is always separately marked.

1   Q   All right. So that would be Q4. All right.

2   A   And then the Adobe involving the security

3   equipment --

4   Q   That would be Q5.

5   A   No. It would be NE1.

6   Q   NE1. NE1. All right.

7   A   And then the report video time line would be

8   NE2.

9   Q   NE2.

10   A   And the QuickTime file would be Q5.

11   Q   All right.

12   A   And you have the one for Q6.

13   Q   All right. We've already discussed Q1 and

14   Q2. Regarding Q4, -5 and -6, which are all videos, did

15   you do any work whatsoever on any of those items?

16   A   -4, -5 and -6? We did work on Q6.

17   Q   Okay. How about Q5? That's the QuickTime

18   MOV file.

19   A   Looks like Q5 we just looked at what was on

20   it.

21   Q   All right.

22   A   Didn't do any analysis.

1   Q   All right. Q4, which are the flash drives,

2   or thumb drives, whatever you want to call them, did

3   you do any work on Q4?

4   A   Again, we looked at what was there. That was

5   all.

6   Q   That was all? All right. So Q1, Q2, Q4, and

7   Q5, other than identifying visually what the human eye

8   can see the content being, and maybe determining the

9   pixels, there was no other work on that whatever; it

10 was just kind of set aside and --

11   A   Well, we did a few -- I mean, not analysis

12 work but we -- we'd look at the frame rate and a few

13 other things, but, yeah, we didn't do any analysis

14 of -- doing anything with it.

15   Q   All right. And the DVRs that we've been

16 discussing that was sent out -- that you sent out which

17 you referred to as a set, all the work on those

18 particular DVDs then are off of Q3 or Q6?

19   A   Well, Q6 I think we just sent a file in so I

20 don't think we actually did any DVDs of that.

21   Q   All right. Well, let's do Q6 real quick

22 because we're going to spend a lot of time on Q3 then.

1   When you say Q6, which is the information

2   that you -- or the material you got from E-Hounds, you

3   indicate you sent a file out. What does that mean?

4   What did you do?

5   A   Yeah, we looked at the files that were on

6   there. It was all under an evidence folder and then

7   there were a number of other folders under that: One,

8   two, three, four, five, six, seven, eight. Eight

9   folders under that. And then each one of these folders

10   contained a number of files.

11   Q   All right. And what files did they

12   contain?

13   A   We actually don't -- I mean, I can give you a

14   general thing, but, like, the first folder contained

15   234 files consisting of files named drive_1_WD500YS.000

16   through drive_1_WD500YS.232 with each being --

17   containing 2,096,128 kilobytes in size, except for the

18   232 file which contained 2,083,832 kilobytes and a file

19   named drive_1_WD500YS.info which was only 11 kilobytes.

20   That info file was opened in a notebook, Notebook

21   software. And all of them go through like that. They

22   contain a bunch -- you know, one of them contains 467

1   files. A lot of files.

2   Q   And did you in fact have a file in that

3   particular Seagate four terabyte hard drive dealing

4   with a second drive DVR 4 for cameras 2, 3, 8, 9, 11

5   and 12? Do your notes reflect that?

6   A   There's just a lot of notes here. I'm sorry,

7   but there's a lot of notes.

8   Q   Take your time.

9   A   Okay. You're looking for which camera?

10   Q   11 and 12.

11   A   Yes. We have a whole paragraph about 11 and

12   12 in here.

13   Q   Does that involve Q6 at all?

14   A   This is all Q6.

15   Q   So Q6 is 11 and 12?

16   A   Well --

17   Q   Among other things.

18   A   There's cam 11 and cam 12 is on there, among

19   other things.

20   Q   All right. Does your Q3 also include camera

21   11 or 12?

22   A   I'm sure it does.

Q   Regarding Q6 specifically with cameras 11 and
12, what if anything did you do with the files
associated with cameras 11 and 12 involving Q6? Just
generally tell me what you did, and then we'll go into
detail later, but give me an idea of what you did with
Q6, cameras 11 and 12.

A   Okay. We extracted all of the TXTS stream
entries from the file Event 20140113132612011.AVI into
a text file in the raw format.

Q   Okay. And why did you do that?

A   Because the index text files tell us time and
other things.

Q   All right. And, again, why did you do that?
It tells time, but why were you interested in time? I
guess what I'm trying to figure out, you've now
acquired that data. How'd you use it? What'd you use
it for?

A   Oh. As I mentioned before, because of the
time-lapse nature of these and the motion sensor, that
the frame rate was not consistent. So you have to
individually take the frames out and put them in the
right place in the time line to make it play back

1 accurately.

2   Q   And how do you accomplish that?

3   A   We have a time line and we know the time of

4 each frame. We put it in that place.

5   Q   The event file and the number that you gave

6 me ending with the last four digits 2011, did you

7 actually look at the content of that to determine what

8 segment of the event that occurred in the theater on

9 January 13th, 2014? Was it captured in that event

10 file?

11   A   It was.

12   Q   And what was the content that was captured?

13   A   I think it was -- again, our client

14 designated the area that he had interest in.

15   Q   Okay. And was there a specific time period

16 that you looked at within that event file?

17   A   Let me see what file we ran. Okay.

18 Remember, it's hard to put exact times on this but it

19 says: Following consecutive AVI files were made from

20 the exported cam 11 folder which indicate that the

21 spans on the first images of the defendant and his wife

22 appearing in the camera view through and following the

1 incident.

2 Q So it's a series of event files. Series of

3 event files with the extension AVI.

4 A No. So, in other words, covers that area --

5 Q From first enters to --

6 A To defendant and his wife appearing in camera

7 following through the incident itself.

8 Q And what analysis did you do with those event

9 files? There was a series or string of event files,

10 not just the one that you gave me, right?

11 A Yep. We also made two times 2 X resize

12 images of pertinent area. We did a shadow highlight

13 thing. That means that, you know, we actually --

14 actually reduced the highlight. Oh, I'm sorry. We

15 reduced the shadow -- lightened the shadow,

16 basically -- dark areas of the scene. And then we did

17 a -- adjusted the contrast and sharpened it.

18 We also put on there, these areas where there

19 was no images, a countdown, the longer areas, so we

20 could -- it counts down. So it's black. In the areas

21 where there's no -- in other words, we put the

22 individual images in there spaced correctly. So if

1   you -- some of the areas, there was 30 pictures per

2   second, approximately, so they're a full-frame video.

3   They just run. But if you had one here and then there

4   wasn't another frame for, let's say -- start with frame

5   1 out of 30 and 5 was there, that would be black.

6   If those areas were lengthy, there would be a

7   countdown that said -- as you watch it, you'd see it

8   count down to zero so the person watching would know

9   it's not like it's -- we missed something; that's just

10   what we did. So it gives you -- tells you that. And

11   it also, you know, shows the actual time to

12   milliseconds.

13   Q   All right. And that was the adjusted time,

14   adjusted to real time.

15   A   Real time what the system was set at.

16   Q   You used the term "approximately" and I

17   understand that, so in your --

18   A   Well --

19   Q   -- at least on the DVDs that I have, it says

20   approximate real time. I've read the heading, you

21   know, in your -- in your video.

22   A   Right. So --

1   Q   Is that what we're talking about?

2   A   Well, the time that -- whatever the system is

3 set at is what the time is. Doesn't mean it's the

4 actual time.

5   Q   I understand.

6   A   Yeah. So -- but the time differential

7 between the frames, the images, are dead on.

8   Q   Yeah.

9   A   Yeah. So -- so we made that.

10   Q   And that was from Q6.

11   A   Q6. Right.

12   Q   The reason I ask that question was because

13 the label on the DVR that I received from the defense

14 only labels Q3 on all three DVRs.

15   A   Okay. Then you must not have that on this.

16 This is from Q6. But there was no DVR; it was a file

17 that was produced.

18   Q   An electronic file?

19   A   Electronic.

20   Q   Well, I'm trying to think what a file means

21 in your terminology. A file was produced. So what

22 does that --

A   Digital file. It was a QuickTime MOV file.
We would call it time-adjusted, enhanced with time
stamps.

Q   Okay. And that was from Q6?

A   Q6.

Q   Other than the enhancements that we just
talked about involving that series of event files, did
you do any other work off of Q6?

A   I think that's the main work we've done on
it. I mean, there's a lot of preliminary stuff to get
there.

Q   I understand.

A   But yeah.

Q   All right. So with Q6 we're talking about a
series or a string of event files in AVI format that
start when Mr. Reeves and Mrs. Reeves are first seen in
the theater up until after the shooting.

A   Yeah. And they have the actual times which
are embedded in that -- remember I told you a stream of
texts --

Q   Mm-hmm.

A   -- files which give the time for each

1   frame.

2   Q   Give the time for each frame?

3   A   Yeah. So we know each frame out ·to a

4   millisecond, a thousandth of a second.

5   Q   And how many frames per second?

6   A   Oh, it varied. That's why we had to do that.

7   It varies. Some places there's obviously no frames per

8   second and some parts there's 30 frames per second but

9   in between there's different ones. So we took each

10   frame and we know the time, the exact time, of that

11   frame.

12   Q   Okay.

13   A   So then we put it in a time line in the right

14   place.

15   MR. ESCOBAR: Glenn, if you want him to

16   explain that in a much clearer way so that you can

17   understand what the difference between Q3 and Q6 is,

18   I'm more than happy to have him do that so you could

19   see that in Q3 they used that last frame in a

20   continuous mode until he picked up the new frame, and

21   at Q6 they used black to separate each frame so that

22   you can understand that difference, because I think --

1   if -- and I may be wrong, but I think you may not

2   understand that -- those two processes. So that was

3   just my answer to you to -- you may want to ask the

4   questions as to that. I don't want to . . . .

5   BY MR. MARTIN:

6   Q   In regarding the work that you did on Q6 --

7   and we're going to discuss in more detail all the work

8   you did from your Q3 -- but I -- the only thing I have

9   is labeled Various Video Clips of Portions of Theater

10   Number 10 Left Side Q3 HD, and with the starting time

11   of 13:22:25.646, and ending at 13:27:07.979, which is

12   apparently a lot shorter than the sequence of event

13   files in Q6.

14   So I guess -- what work was different -- how

15   was Q6 work different than Q3, what I have?

16   A   Right. What Attorney Escobar talks about,

17   let's say you're sitting in that chair, okay, and you

18   get up and you go over and sit in that chair. Okay.

19   But let's say that motion doesn't get picked up. So in

20   Q3, what would happen is, we'd have an image of you

21   sitting there, and let's say it picks it up three

22   seconds later. What would happen is, you're sitting

1 there would stay there that whole three seconds, and

2 then all the sudden you're in that chair.

3   Q   Mm-hmm.

4   A   Okay. The Q6 one is, we take an image of you

5 in that chair and then there's three seconds. That

6 three seconds the screen is black. And then you're in

7 that chair. Because the recording system did not

8 record any of those information in between you getting

9 up and getting in that chair.

10   Q   Is that the only difference?

11   A   Yeah, other than we took it, you know, from a

12 different format, you know, took it from the Q6 instead

13 of the Q3.

14   Q   All right. And Q6 is in a Quick movie

15 format?

16   A   Oh, Q6. Yes. It was in a QuickTime MOV

17 format.

18   Q   And what format is Q3 in?

19   A   I think all of you would have -- they're all

20 in -- on DVDs. They -- they're on video DVDs, so

21 they're in a video DVD format.

22   Q   Anything else with Q6?

1   from that.

2   And then the last one is Q6, which we talked

3   about before that we sent on November 20th of 2015.

4   And that's also in a zip file but it is a video.

5   Q   And where on your list do you have 44 still

6   frames, bit files, from 13:26:25.679 to 13:26:26.812,

7   loop bit, 44 still frames, loop bit, with markings, 44

8   still frames, where you took the white reflection and

9   circled it in red? Where do you have that on your

10   list?

11   A   I think the designated region, like the one I

12   told you had 41 images. Let's see. That's 39 -- yeah.

13   That's probably the ones you're referring to, without

14   seeing them. So that has 41 images in there. Like I

15   say, we sent that on October 12th.

16   Q   I have 44 images off that CD.

17   MR. ESCOBAR: Off which CD?

18   MR. MARTIN: Huh?

19   MR. ESCOBAR: Off which CD? Just identify

20   the CD you're talking about.

21   MR. MARTIN: The CD that you marked and gave

22   to me as CD No. 2, still frames, 13:26:25.679 to

1   night of the incident.

2   Q   Were you able to accomplish that?

3   A   No.

4   Q   Did you conduct a physical examination of

5   either camera 11 or camera 12 within theater 10?

6   A   I physically looked at them. I probably even

7   took -- yeah, I even took a picture of the cameras

8   and -- took pictures of the cameras.

9   Q   Okay. And what did you learn during your

10 physical inspection of the cameras?

11   A   They were cameras. In other words, our

12 problem was not that. We -- at that night we really

13 didn't know if the cameras had been replaced or the

14 zoom functions or other parameters had been changed,

15 but we knew what was coming into the recording system

16 did not match the view we had off the original video

17 images.

18   Q   So that attempt of recreating, at least from

19 the camera's standpoint, the view that was seen and

20 captured on January 13th, 2014, you were not able to

21 accomplish.

22   A   That's correct.

1   so you know what you gave me because your detectives

2   told you what you gave me.

3   MR. MARTIN: And he's saying that he sent

4   that to you. That's a product that he made that he

5   sent to you.

6   MR. ESCOBAR: I don't know what the --

7   MR. MARTIN: So it's not Waylon's stuff.

8   MR. ESCOBAR: I don't know what the product

9   contains. That's the problem.

10   BY MR. MARTIN:

11   Q   What does the product contain? So

12   Mr. Escobar will know whether or not he has it.

13   MR. ESCOBAR: Right.

14   A   Okay. All of them start off with our lab

15   number Q3 side-by-side image comparison and all of them

16   are 4X resize, in parentheses, and then the first one

17   is cropped, designated region marked; the second one is

18   cropped, enhanced as designated region marked; next one

19   is designated region marked; and the last one is

20   enhanced and region marked, all bitmap images.

21   MR. ESCOBAR: That's what I'm saying: I

22   can't tell you whether that was what you got or what

1   MR. MARTIN: I am not mistaken.

2   MR. ESCOBAR: Well, I can tell you --

3   MR. MARTIN: I don't have --

4   MR. ESCOBAR: -- I gave you what he gave me.

5 Why would I not? There's no reason not to give it to

6 you, Glenn.

7 BY MR. MARTIN:

8   Q.   What else did you give Mr. Escobar that he

9 doesn't know that he has?

10   A   Well, I can't answer the end of your

11 question. I can tell you --

12   Q   What else did you give him?

13   A   Okay. On October 12th we sent enhanced and

14 region marked images, and it's 12 -- 132636-123637 zip.

15 It's like the one before was a zip file. We uploaded

16 it to the server and linked the email to you all on

17 October 12th, 2015. So that's a second zip file.

18   And then, on October 13th, 2015, we sent you

19 another zip file that contained one, two, three, four,

20 five, six, seven, eight, nine, ten, eleven bitmaps.

21 The one before that had 41 bitmaps, okay? And this one

22 is theater 10, left side, and various enhanced images

1   from that.

2   And then the last one is Q6, which we talked

3   about before that we sent on November 20th of 2015.

4   And that's also in a zip file but it is a video.

5   Q   And where on your list do you have 44 still

6   frames, bit files, from 13:26:25.679 to 13:26:26.812,

7   loop bit, 44 still frames, loop bit, with markings, 44

8   still frames, where you took the white reflection and

9   circled it in red? Where do you have that on your

10   list?

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12   told you had 41 images. Let's see. That's 39 -- yeah.

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14   seeing them. So that has 41 images in there. Like I

15   say, we sent that on October 12th.

16   Q   I have 44 images off that CD.

17   MR. ESCOBAR: Off which CD?

18   MR. MARTIN: Huh?

19   MR. ESCOBAR: Off which CD? Just identify

20   the CD you're talking about.

21   MR. MARTIN: The CD that you marked and gave

22   to me as CD No. 2, still frames, 13:26:25.679 to

1   report or not. So we always do work notes on every

2   case.

3   Q   And what are work notes?

4   A   They're a listing of what we've done.

5   Q   And is that work notes typewritten or

6   handwritten?

7   A   Most of it's typed; some is handwritten.

8   Q   And do you sill have those typed notes?

9   A   Yes.

10   Q   And approximately how many pages are the

11   typed notes?

12   A   41. Plus there's other notes and things like

13   spreadsheets and all, so there would be additional

14   beyond that.

15   Q   Regarding the 41 pages of typed notes and

16   what you referred to as other notes and spreadsheets,

17   will all of those be reviewed by you prior to

18   testifying at any hearing or trial?

19   A   Probably.

20   Q   Prior to coming in to this deposition, did

21   you in fact review those typed notes, 41 pages, or any

22   other notes or spreadsheets in order to prepare for

1   this particular deposition?

2   A   I reviewed the 41 pages typed, a few

3   written -- handwritten. I didn't look at the

4   spreadsheets.

5   Q   And prior to today's deposition, how many

6   days prior to this deposition did you review those

7   notes?

8   A   I reviewed them yesterday.

9   Q   And how much time did you spend reviewing

10   those notes?

11   A   An hour.

12   Q   In that hour that you spent reviewing those

13   notes, was that beneficial so that you could testify

14   accurately today in this deposition?

15   A   I think it certainly helps and saves time

16   finding things.

17   Q   And in fact refreshed your memory --

18   A   Yes.

19   Q   -- as to what you did?

20   A   Yes.

21   Q   Would the typed notes that you have, would

22   they be consistent with what other agencies, police