

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

DENNIS HUNT,

Plaintiff,

Case No. 8:07-cv-1168-T-30TBM

vs.

LAW LIBRARY BOARD,  
a Board created by  
Hillsborough County,  
Florida,

NORMA J. WISE,  
in her official capacity  
as Director of the James L.  
Lunsford Law Library, and  
individually, and,

DAVID L. PILVER,  
individually,

Defendants.

DEPOSITION OF: DENNIS HUNT

TAKEN BY: Counsel for the Defendants

DATE: November 26, 2008

TIME: 9:43 a.m. to 10:54 a.m.

PLACE: Richard Lee Reporting  
Suite 2060  
100 North Tampa Street  
Tampa, Florida

REPORTED BY: Kimberly Himes  
Notary Public  
State of Florida at Large

**RICHARD LEE REPORTING**  
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## APPEARANCES:

RYAN CHRISTOPHER RODEMS, ESQUIRE  
Barker, Rodems & Cook, P.A.  
Suite 2100  
400 North Ashley Drive  
Tampa, Florida 33602  
Appeared for Plaintiff;

STEPHEN M. TODD, ESQUIRE  
Hillsborough County Attorney's Office  
Post Office Box 1110  
Tampa, Florida 33601-1110  
Appeared for Defendants.

## ALSO PRESENT:

Norma J. Wise  
David L. Pilver

I N D E XPAGE

Examination by Mr. Todd

3

1           The deposition, upon oral examination, of  
2 DENNIS HUNT, taken on the 26th day of November,  
3 2008, at Richard Lee Reporting, Suite 2060, 100  
4 North Tampa Street, Tampa, Florida, beginning at  
5 9:43 a.m., before Kimberly Himes, Notary Public in  
6 and for the State of Florida at Large.

7                           \* \* \* \* \*

8                           DENNIS HUNT,  
9 being first duly sworn to testify the truth, the  
10 whole truth, and nothing but the truth, was examined  
11 and testified as follows:

12   EXAMINATION

13 BY MR. TODD:

14           Q           Well, good morning again, Mr. Hunt. My  
15 name is Stephen Todd. I'm an attorney for the  
16 Defendants in this case, and we're going to have an  
17 opportunity to ask you some questions about your  
18 lawsuit today. Let's start with your name -- your  
19 full name for the record, please?

20           A           Dennis Brice Hunt.

21           Q           Brice is with a Y?

22           A           No, it's with a -- B-r-i-c-e.

23           Q           Okay. Thank you.

24                           And what's your current address?

25           A           My address is 2319 Nantucket Drive, Sun

1 City Center, Florida 33573-8005.

2 Q All right. Thank you.

3 Have you ever had your deposition taken  
4 before, Mr. Hunt?

5 A No. This is my first deposition.

6 Q All right. Well, let me go through some  
7 of the basic ground rules. You may have already  
8 discussed them with your attorney, which leads to  
9 the first ground rule, and that is don't reveal any  
10 discussions that you -- you've had with your  
11 lawyer. Those are privileged, and your attorney  
12 will make the appropriate objections, if -- if that  
13 issue does come up. Okay?

14 A Okay.

15 Q All right. The second instruction is --  
16 I don't think we're going to have a problem with  
17 this, but I'll ask a question, and if you could give  
18 your answer after I'm finished with my question,  
19 I'll likewise attempt the best I can to wait for  
20 your answer to conclude before I ask the next  
21 question. That way we have a very clean record of  
22 what's being typed up. Okay?

23 A Okay.

24 Q And, lastly, it's very important that you  
25 enunciate an answer to a question. "Uh-huh,

1       huh-uh," shaking of your head and answers of that  
2       nature do not come across on a transcript. So it's  
3       important that you say, "Yes," "No," "Maybe," "I  
4       don't know" -- whatever your answer is -- so that  
5       it's very clear for the record. Okay?

6               A       Yes.

7               Q       If you need a break -- I don't  
8       contemplate us being here in a marathon session, but  
9       if you do need one, that's always fair game. Just  
10      ask and we'll take a break. Okay?

11              A       Okay.

12              Q       Thank you, sir.

13                      Now, who have you talked to in  
14      preparation for this deposition today?

15              A       My attorney, Chris Rodems.

16              Q       Anybody else?

17              A       No.

18              Q       And what have you reviewed in preparation  
19      for this deposition?

20              A       The transcript of the trial -- the  
21      criminal trial transcript.

22              Q       Would that be the Judge Nazaretian trial  
23      or the Judge Barber trial?

24              A       The Judge Barber trial.

25              Q       Did you review the entire transcript in

1 preparation for the deposition today?

2 A No.

3 Q Which part did you review?

4 A I reviewed the testimony.

5 Q Whose testimony?

6 A It would be my testimony, Ms. Kala Herr's  
7 testimony, and -- those two I know I read. I'm  
8 wondering -- now, I must have -- I think Mr. Pilver  
9 testified, so I must have -- must have -- I'm not  
10 sure whether I read his testimony now or not. I'm a  
11 little unsure.

12 And then the police officer, I think,  
13 testified, too, and I think I did read the police  
14 officer. Those are not as fresh in my mind as my  
15 testimony and Kala Herr's.

16 Q Okay.

17 A But I believe I must have went through  
18 them.

19 Q All right. Let's start with a little bit  
20 of background, Mr. Hunt. Where were you born?

21 A I was born in the State of Connecticut.

22 Q All right. And when did you move out of  
23 the State of Connecticut?

24 A In the year 2000 -- or about 2000, or it  
25 was around there.

1 Q Okay. Where is the last city you lived  
2 in in Connecticut?

3 A Newtown.

4 Q And from there did you move to Florida?

5 A Yes.

6 Q Why did you move from Newtown,  
7 Connecticut to Florida?

8 A Climate.

9 Q Okay. About how old were you when you  
10 moved in 2000?

11 A 45.

12 Q 45 years old. Tell me a little bit about  
13 your educational background. What's the highest  
14 level of education that you've achieved in life?

15 A A four-year university degree,  
16 bachelor's.

17 Q Bachelor of Arts or Science?

18 A Bachelor of Business Administration.

19 Q Where did you get your degree?

20 A Western Connecticut State University.

21 Q Do you have any minors besides the  
22 business administration degree?

23 A It was a concentration in management  
24 information systems.

25 Q So you're -- would you characterize

1 yourself as a computer science expert?

2 A That was my schooling, yes.

3 Q Okay.

4 A It wasn't specifically computer science,  
5 but it was very close. Management information  
6 systems is very close to computer science, but that  
7 is a different degree.

8 Q All right. Are you a qualified -- in  
9 your view, a qualified computer programmer?

10 A Yes.

11 Q In what languages do you program?

12 A Primarily the dBASE languages, database.

13 Q Okay. And are you one of the group of  
14 people who would have a strong opinion one way or  
15 the other about Microsoft products?

16 A No.

17 Q All right. Do you have any other area of  
18 expertise besides your management information system  
19 background?

20 A Professionally, I don't -- I wouldn't say  
21 expertise, no.

22 Q All right.

23 A Just general business, you know, related  
24 things.

25 Q Now, prior to moving to Florida, did you



1 have any interest in legal research?

2 A Not -- not in -- no. No.

3 Q When is the first time that you had an  
4 interest in going to the library to do legal  
5 research?

6 A It was after I had lost title to an  
7 automobile that I owned, and I wanted to recover the  
8 value of the automobile.

9 Q When did that happen?

10 A It happened in the first year that I  
11 moved here. Sometime during the first year. So  
12 that would be around 2000.

13 Q And what was your goal when you were  
14 trying to do legal research?

15 A My goal was to educate myself in the  
16 legal process and procedures, and to enable myself  
17 to file a claim against the correct parties.

18 Q Were you successful in achieving your  
19 goal?

20 A Yes.

21 Q How did you -- how did you fare? Did you  
22 get the vehicle back or the value of the vehicle?

23 A I got the value of the vehicle.

24 Q You did so without hiring an attorney?

25 A Yes.

1 Q All right. Is Mr. Rodems the first  
2 attorney you've ever hired?

3 A I think so, yes.

4 Q Now, when you did your legal research in  
5 2000 or 2001, where did you do that research?

6 A I did it at the James J. Lunsford Law  
7 Library. I believe it's on Kennedy Avenue here in  
8 Tampa, Florida, Hillsborough County.

9 Q How often did you go to the library to do  
10 research for that project?

11 A Two to four times a week, I'd say, about.  
12 It varied. At least a couple times a week, but  
13 usually more.

14 Q All right. And in your experience  
15 working at the law library in 2000, 2001, did you  
16 seek the assistance of any of the staff members at  
17 the library?

18 A Yes.

19 Q Do you remember if Mr. Pilver was one of  
20 those people?

21 A Yes.

22 Q Okay. What types of assistance would you  
23 have requested of Mr. Pilver back in 2000, 2001?

24 A Requesting material that was held behind  
25 the desk, on the bookshelf behind the desk, manuals.

1 Procedure manuals. Primarily Florida procedure  
2 manuals.

3 Q All right. How would you characterize  
4 the level of assistance that you received from  
5 Mr. Pilver in 2000 and 2001?

6 A I'm not sure that -- that those years are  
7 correct. I think you're mistaken on those years.  
8 You're assuming another answer is -- an answer to a  
9 different question is -- are those years.

10 Q Well, let's back up a little bit just to  
11 get it correct. You testified that you first did  
12 legal research at the Lunsford Library in around  
13 2000, 2001.

14 A Wait a minute. I'm not sure that I said  
15 during those years that I was -- did legal research  
16 during those years. That's what I mean. I -- you  
17 asked me when I had the difficulty with the car, and  
18 I believe that was around 2000.

19 And I know I had been going to the  
20 library for a couple years prior to the incident  
21 that -- my being denied access, so -- but 2001. I'm  
22 not sure 2000 I was there. I didn't immediately go  
23 to the library, but I know I had been going for some  
24 time, but I don't believe I went there in 2000. I  
25 may have stopped in just to view the -- because I

1 looked around town.

2 Q All right. So we'll say 2001 is when you  
3 started going to the Lunsford Library. Is that  
4 correct? Which would have been two years before the  
5 July '03 incident.

6 A No. I think I was going -- I think it  
7 had been about a year prior to the incident, so that  
8 would be -- would make it 2002 when I was regularly  
9 going to the library. Now, I may have visited the  
10 library prior to that, but in reference to legal  
11 research regarding the car, specifically, it would  
12 have been sometime a year -- within a year prior to  
13 July of 2003.

14 Q 2002, basically, is when you would have  
15 done the research about the car title at the  
16 Lunsford Library?

17 A From 2002 to 2003, yes.

18 Q All right. Now, prior to July of '03,  
19 did you have occasion to do research regarding any  
20 other subject at the Lunsford Library?

21 A I'm not sure. I may -- like I say, I may  
22 have stopped in and browsed the library.

23 Q All right.

24 A You know, it's -- I don't recall a  
25 specific instance.

1 Q Did you have a custody or a family-law-  
2 oriented issue that you addressed in the Tampa  
3 courts prior to July of '03?

4 A No.

5 Q Okay. So no family -- what I would  
6 characterize as family-law issue of any kind prior  
7 to July of 2003 that involved you?

8 A In the Tampa court?

9 Q In the Tampa court?

10 A No.

11 Q Did you ever have a custody issue that  
12 involved you in any other court besides Tampa prior  
13 to July of '03?

14 A Yes.

15 Q All right. Where was that court?

16 A Danbury, Connecticut.

17 Q How do you spell the name of the town?

18 A D-a-n-b-u-r-y.

19 Q Okay. Thank you.

20 Did that issue somehow involve the Tampa  
21 courts in any way after you moved down here?

22 A No.

23 Q Did you ever have occasion to do legal  
24 research at the Lunsford Library regarding that  
25 issue that was being addressed in Danbury,

1 Connecticut?

2 A No.

3 Q All right. Prior to your being  
4 trespassed in July of '03 from the Lunsford Library,  
5 did you ever research any other issue besides the  
6 title -- vehicle title issue that you have  
7 described?

8 A No.

9 Q All right. In July of '03, you went to  
10 the Lunsford Library, I presume, to do legal  
11 research. Correct?

12 A Yes.

13 Q All right. And what were you -- what was  
14 the subject matter of your research generally?

15 A It was small claims, civil liability.  
16 Something to do with condominium associations and  
17 board of directors and the responsibility --  
18 liability and responsibility --

19 Q Were you --

20 A -- of towing companies. The -- all the  
21 laws concerning that issue of towing.

22 Q Did your condo association tow your  
23 vehicle?

24 A They had it towed, yes.

25 Q What was the name of the condo

1 association?

2 A I believe the name is The Oaks Phase II  
3 Condominium Association.

4 Q What's the first name? I'm sorry.

5 A The Oaks.

6 Q Oaks.

7 A Like the oak tree. The Oaks Phase II  
8 Condominium Association.

9 Q And what was your goal in your legal  
10 research in July of '03?

11 A To enable myself to file a claim -- a  
12 small claims to recover the value of the vehicle  
13 that was towed off the condominium property.

14 Q Were you successful in achieving your  
15 goal?

16 A Yes.

17 Q So you got your -- the value of your  
18 vehicle from the condo association?

19 A No. I got it from the insurer of the  
20 condominium association board of directors for  
21 wrongdoing.

22 Q Okay. Were you gainfully employed in  
23 early July of 2003?

24 A No.

25 Q Were you unemployed at that time?

1 A Yes.

2 Q All right. Did you have anything that  
3 occupied your time during the days besides legal  
4 research in early July of 2003?

5 A Yes.

6 Q And what was that?

7 A I would visit the courthouse and sit in  
8 the courtrooms.

9 Q What types of cases would you find  
10 interesting?

11 A My interest was in civil cases, civil  
12 liability.

13 Q When did you first start doing the  
14 observation of civil cases in the Hillsborough  
15 courts?

16 A That would be during the same period that  
17 I went to the James J. Lunsford Law Library and  
18 probably prior to my going to the Lunsford Library.  
19 So it may be a couple years there.

20 Q Is there a particular case that kind of  
21 piqued your interest in watching civil trials a  
22 couple years before the middle of '03?

23 A No.

24 Q What precipitated your interest in  
25 watching civil trials?



1           A           I wanted to learn the court process and  
2 procedures to be able to recover the value of my  
3 car, and I became interested in law and the study of  
4 law.

5           Q           Since July of '03, have you continued  
6 with your interest in watching civil trials?

7           A           Yes, but not to the same degree.

8           Q           A little bit less than -- less frequently  
9 than previously?

10          A           Yes. Quite -- quite less frequently,  
11 especially now that I have moved out of Tampa.

12          Q           Are you employed today?

13          A           No.

14          Q           When is the last time you have held  
15 gainful employment?

16          A           June of 2008.

17          Q           Where were you employed?

18          A           I was employed by a company called  
19 Eyeshot.

20          Q           Can you spell that, please?

21          A           E-y-e-s-h-o-t.

22          Q           What did Eyeshot do?

23          A           They're an advertising promotional  
24 company.

25          Q           What did you do for Eyeshot?

1           A       I did sign holding.

2           Q       I see that a lot on the rights-of-way.

3           Is that what you're referring to?

4           A       No.

5           Q       Can you describe the nature of your work  
6           for Eyeshot?

7           A       It was real estate sales and business  
8           promotions.

9           Q       What was your specific duty and job with  
10          Eyeshot?

11          A       Sign holder; sometimes referred to as a  
12          sign spinner.

13          Q       So you would be standing in a certain  
14          place with a sign advertising a business? Is that  
15          generally what you would do?

16          A       Yes.

17          Q       Okay. When did you start that job?

18          A       I think roughly within a two-year  
19          period. It's been about -- I think more than a  
20          year, and maybe between one and two years.

21          Q       So about '06? Thereabouts?

22          A       Maybe. Maybe '07.

23          Q       Okay. And you said that you stopped  
24          working for them in June. Why did you leave?

25          A       I didn't leave. I just didn't get

1 any more assignments.

2 Q They didn't have any more work for you?

3 A I didn't receive any more assignments  
4 after then.

5 Q Okay. So were you working as an  
6 independent contractor for them or as an employee?

7 A As an employee.

8 Q Are you still on their payroll?

9 A I'm not receiving any pay from them, but  
10 I -- I'm still in contact with them and requesting  
11 assignments.

12 Q So if you don't work on a specific job,  
13 are you paid by Eyeshot?

14 A No.

15 Q So it's on a per-job basis?

16 A Yes.

17 Q Did you work for any other entity,  
18 including yourself, at any time while you were  
19 working for Eyeshot?

20 A No.

21 Q Have you ever provided computer  
22 consultation services of any kind professionally?

23 A Yes.

24 Q When is the last time that you did so?

25 A It would be in the early 1990s; early to

1 middle 1990s.

2 Q What is the most recent job that you held  
3 prior to the Eyeshot position?

4 A I'm not sure if I remember the title, but  
5 it was, you know, programming related. It was  
6 database programming.

7 Q Do you know the name of the company?

8 A The name of the company was Forecast  
9 International.

10 Q Where are they located?

11 A They're located in Newtown, Connecticut.

12 Q Did you perform work for them on site in  
13 Newtown, Connecticut?

14 A Yes.

15 Q During what period of time did you work  
16 for them?

17 A It was a short period of time. I believe  
18 it was four months.

19 Q What year was that?

20 A In the period that I told you: the middle  
21 '90s, middle to early '90s. I'm not sure of the --  
22 I don't recall the year specifically.

23 Q All right. So in the period between 2000  
24 -- approximately when you moved to Florida -- and  
25 the time that you obtained work with Eyeshot, how

1 did you make ends meet? How were you able to  
2 survive? Through what means of income?

3 A Social Security Disability --

4 Q Okay.

5 A -- income.

6 Q When did you first start receiving Social  
7 Security Disability?

8 A I believe it was in the middle 1990s.  
9 The specific year I don't have in my mind.

10 Q Did you have any other source of income  
11 besides Social Security Disability between 2000 and  
12 2005?

13 A No.

14 Q Okay. Now, you had testified previously  
15 that you have reviewed your transcript of the trial  
16 before Judge Barber in your criminal case. Is there  
17 any part of your testimony from that trial that you  
18 would change sitting here today?

19 A No.

20 Q I noticed from the court docket that  
21 there appears to be an appeal that's still going on  
22 regarding that case. Is that correct?

23 A I'm unsure.

24 Q Do you have counsel who is representing  
25 you in an appeal of this particular case?

1 A I'm unsure.

2 Q You're unsure --

3 A I don't --

4 Q -- if you have counsel?

5 A That's correct.

6 Q Have you ever had counsel who represented  
7 you in this case in an appeal?

8 A I had a couple -- a couple of attorneys  
9 that dropped out, withdrew.

10 Q All right. So as far as you know today,  
11 you don't know if there is an appeal going on, and  
12 you don't know if you have a lawyer in that case?

13 A That's correct, yes.

14 Q Okay. Have you ever been informed that  
15 there was a disposition of the appeal of your  
16 criminal case?

17 A No.

18 Q Is it your current intent to continue to  
19 pursue an appeal of the criminal case from 2005?

20 A Yes.

21 Q Okay. If you win your appeal -- I'm  
22 sorry. Strike that.

23 If you win this case, do you believe that  
24 that would imply that you should not have been  
25 convicted of trespassing in 2005?

1 A Yes.

2 Q Why is that?

3 A Because it says it's wrong. Otherwise,  
4 you wouldn't win it.

5 Q It says that the criminal conviction was  
6 wrong in your view?

7 A Yes.

8 Q Okay. So in other words, if you win this  
9 case -- this case we're here about -- then that  
10 would imply that the result in the criminal case was  
11 wrong in your view?

12 A Yes.

13 Q Now, since July of 2003 have you had any  
14 contact of any kind with Mr. Pilver, besides your  
15 presence here today and his appearance and your  
16 appearance at the criminal trial?

17 A No.

18 Q So you haven't had any discussions,  
19 conversations, emails, letters, nothing with  
20 Mr. Pilver since July of '03 about any subject?

21 A That's correct.

22 Q Now, likewise, have you had any  
23 conversations or exchanges of any kind with Ms. Wise  
24 from July of '03 to the present date about anything?

25 A I can't recall any.

1 Q Okay. Have you had any conversations or  
2 correspondence or emails with respect to any  
3 employees of the law library -- the Lunsford Law  
4 Library since July of 2003?

5 A I believe so. I think I did receive a  
6 court -- a letter.

7 Q Was it related to your criminal case?

8 A Yes, I think so.

9 Q What was it about generally, the letter?

10 A It was in response to a public  
11 information request.

12 Q A Public Records Act request?

13 A Yes.

14 Q And what generally was the nature of your  
15 request?

16 A Specifically, I do not recall off the top  
17 of my head what that was in reference to.

18 Q Have you had any other contact with any  
19 employee of the law library that you knew of since  
20 July of '03 besides that letter?

21 A No.

22 Q All right. Have you attempted to contact  
23 the library board at any time since July of 2003 for  
24 any reason?

25 A Yes, I believe I have.



1 Q All right. Can you describe the first  
2 such time that you did so after July of '03?

3 A No, I cannot.

4 Q You don't remember?

5 A Specifically what -- the first time what  
6 it was, no.

7 Q All right. Have you contacted the  
8 library board or attempted to contact the library  
9 board more than once between July of '03 and today?

10 A Yes.

11 Q Have you attempted to contact the library  
12 board more than five times between July '03 and the  
13 present date?

14 A I believe so, yes.

15 Q All right. More than 10 times between  
16 July '03 and the present date?

17 A Might be more than 10 times.

18 Q Okay. More than 15?

19 A I'm not sure if it would be more than 15.

20 Q Of those 10-plus times, we'll say, did  
21 you ever contact them or attempt to contact the  
22 library board in writing?

23 MR. RODEMS: Object to the form.

24 A Yes.

25 Q How many of those 10-plus times was a

1 written attempt?

2 MR. RODEMS: Object to the form.

3 A Most.

4 Q Did you keep copies of all of your  
5 written attempts to contact the library board  
6 subsequent to July of '03?

7 A I believe so, yes. Yes.

8 Q Were your attempts to contact the library  
9 board about one subject or about multiple subjects?

10 A Multiple subjects.

11 Q I see. What were the multiple subjects?

12 A Rules, regulations, library rules,  
13 library regulations, library holdings, procedures,  
14 equipment, other things. Likely other things.

15 Q All right. And did you receive responses  
16 to your queries -- your written and verbal queries?

17 A Most of them.

18 Q When you received responses, who would  
19 send the responses?

20 A I'm at a loss for her name at this  
21 moment. She's an attorney with the -- she's a  
22 county -- with the county attorney's office. And  
23 her name was Campbell, but I think she got married.

24 Q Mary Helen Ferris?

25 A And now she's, yeah, Mary Helen Ferris.

1 Q And Ms. Ferris responded to most of your  
2 queries to the library board?

3 A Yes.

4 Q Between '03 and the present date?

5 A Yes.

6 Q Do you keep copies of her responses?

7 A Yes.

8 Q Did you ever attend a library board  
9 meeting subsequent to July of '03?

10 A No.

11 Q Did you ever attempt to attend a library  
12 board meeting subsequent to July of '03?

13 A No.

14 Q It's my understanding that you've  
15 attended one library board meeting, and that was  
16 prior to July of '03. Is that correct?

17 A Yes.

18 Q Was the subject matter of your attendance  
19 at that meeting involved with the copier issue  
20 that's discussed in your lawsuit?

21 A Yes.

22 Q All right. And describe to me how that  
23 meeting went in your view.

24 A Fine.

25 Q Did you perceive that you had any

1 problems with the board?

2 A No.

3 Q Did you get the relief that you were  
4 requesting from the board on that date?

5 A Yes.

6 Q What relief was that?

7 A To not prevent me from using my own self-  
8 copy device -- or copying device to receive the  
9 information within the law library.

10 Q So they allowed you -- the board allowed  
11 you to bring your own copy machine to the library to  
12 make copies of the materials at the library?

13 A At that meeting it was decided that  
14 Florida Law provided that I had the right to do  
15 that.

16 Q It's my understanding that the board also  
17 waived any fees associated with your making copies  
18 from your personal copier. Is that your  
19 understanding?

20 A No.

21 Q What was your understanding regarding the  
22 fees associated with your making copies from your  
23 own copy machine?

24 A There were -- there are none.

25 Q There are none, because they were waived,

1 or there are none by law? Which was your  
2 understanding?

3 A There are -- they're never -- they never  
4 had any set fees for that. There was never any --  
5 it never existed. The law provides for it, but they  
6 never had any fees for that.

7 Q So in your --

8 A That's -- I requested records. I have no  
9 -- nothing that indicates that they ever charged  
10 a fee for that.

11 Q So if there was a fee, you were never  
12 charged a fee to the best of your knowledge for  
13 copying from your own personal copy machine?

14 A After the -- after that meeting when they  
15 said it was okay, no.

16 Q Now --

17 A Prior to that I could not use my -- I  
18 abided by the -- Mr. Pilver's request that I not use  
19 my copier, though I disagreed with the policy.

20 Q You had discussed communications of  
21 possibly more than 10 times with the library board  
22 after July of '03 in which you discussed multiple  
23 subjects. Did you ever make a request to the  
24 library board that you be reinstated to allow you to  
25 go back to the library subsequent to July of '03?

1 A No.

2 Q Why not?

3 A Because there is no procedure to do so.

4 Q Was there a procedure to allow you to  
5 bring your copier into the library?

6 A I don't know whether that -- what they  
7 did. There was -- I was not able to bring it in,  
8 and that was the issue I had with -- regarding the  
9 copier. There was -- they didn't allow it.

10 The -- Mr. Pilver expressed, you know,  
11 the finances that they needed on money, and that's  
12 all they had. And the -- Ms. Wise expressed the  
13 same in a letter.

14 Q Now, I'd like to turn for just a minute  
15 to the events of July 5th of 2003. Do you recall  
16 that that was the date when you received from law  
17 enforcement -- actually, I think that you were  
18 arrested on that date. Correct?

19 MR. RODEMS: If we're going to change  
20 topics, would this be a good time to take a  
21 break?

22 MR. TODD: I don't have that much  
23 longer, Chris, if you want to --

24 MR. RODEMS: Oh, okay.

25 MR. TODD: Okay. If you want to take a

1 break, of course, it's not a problem.

2 MR. RODEMS: I just need a minute.

3 (Recess from 10:33 a.m. to 10:45 a.m.)

4 BY MR. TODD:

5 Q All right. I was starting to ask you  
6 about the incident on July the 5th of '03. Do you  
7 recall that incident, sir?

8 A Yes.

9 Q All right. Can you describe what  
10 happened?

11 A I went to the James J. Lunsford Law  
12 Library to, as I regularly do -- had been doing to  
13 do legal -- my legal research and make copies and  
14 was arrested for trespassing.

15 Q Who arrested you?

16 A Um, a Tampa police officer. I believe  
17 his name was Charles Hathcox.

18 Q Can you spell Hathcox, please?

19 A H-a-t-h-c-o-x.

20 Q Prior to your being arrested for  
21 trespassing, did you refuse to leave the law library  
22 on two different occasions?

23 A No.

24 Q Prior to being arrested for trespassing,  
25 did you refuse to leave the law library on one

1 occasion?

2 A No.

3 Q Did you indicate to TPD Officer Hathcox  
4 prior to your being arrested for trespassing that  
5 you were going to stay in the law library until it  
6 closed that day?

7 A Yes.

8 Q But your testimony is that by saying that  
9 you intended to stay in the law library, that was  
10 not a refusal to leave the law library?

11 A I don't understand the question.

12 Q Okay. Mr. Pilver had a legal proceeding  
13 of his own in approximately 2005 involving a  
14 landlord-tenant matter. Do you recall attending  
15 such a hearing in the gallery of the courthouse --  
16 of the courtroom involving Mr. Pilver?

17 A Oh, you know, there was a day that I was  
18 in the courthouse, and I think there was a -- I was  
19 -- I think there was a hearing with Mr. Pilver,  
20 yes.

21 Q Was this before the July '03 incident?

22 A No, I think it was afterwards.

23 Q Was it before your trial before Judge  
24 Nazaretian?

25 A I'm not sure. I'm not sure.



1 Q Was it before your trial before Judge  
2 Barber?

3 A I'm not sure. I don't know.

4 Q Were you a witness in that proceeding?

5 A No.

6 Q Why were you there?

7 A I believe it was in the afternoon or  
8 morning. I don't even know whether it was morning  
9 or afternoon. It was a day that I was at the  
10 courthouse sitting in on court cases, as I regularly  
11 do -- had done.

12 Q As you sat there in the courtroom, this  
13 was certainly after you had been arrested for  
14 trespassing. Correct?

15 A Yes, I believe it -- I believe so. I  
16 think it was.

17 Q At the time that you were sitting in the  
18 courthouse on that day, in your own mind did you  
19 blame Mr. Pilver for your arrest on July 5th of '03?

20 A How so?

21 Q In any way? Did you bear any animus at  
22 all with regard to Mr. Pilver as you sat there in  
23 his legal proceeding?

24 MR. RODEMS: Object to the form.

25 A I'm not sure -- are you -- I'm not

1 catching what -- how to respond to this answer.

2 Q Well, the question -- I'll try to  
3 rephrase it.

4 You're sitting in the courthouse at a  
5 specific courtroom where you see Mr. Pilver.

6 Correct?

7 A Yes.

8 Q And this is after you had been arrested  
9 for trespassing on July 5th, '03. Correct?

10 A I believe it was, yes.

11 Q Okay. And as you're sitting there in the  
12 courtroom watching Mr. Pilver's proceeding, what is  
13 your feeling towards Mr. Pilver?

14 A I don't know. I know he was the cause of  
15 a problem -- the cause of a -- my problems with the  
16 library.

17 Q All right. So as you're sitting --

18 A But --

19 Q Go ahead. Finish your answer.

20 A I don't know what else to say. I didn't  
21 say anything to him or --

22 Q Would it be fair to say that you did  
23 not --

24 A He came in -- I was sitting there when he  
25 came in.

1 Q You did not despise Mr. Pilver as you sat  
2 there in the courtroom that day?

3 MR. RODEMS: Object to the form.

4 A I -- I really don't understand what --  
5 how I'm supposed to respond to these questions.

6 Q Well, you have an opportunity to say  
7 "yes" or "no." You did despise him or you did not  
8 despise him?

9 A Can you define despise?

10 Q Whatever you think that word means.

11 MR. RODEMS: Object to the form.

12 A Well, I -- I don't know what it means.  
13 I'm asking you to tell me what it means. I don't  
14 understand the meaning of the word --

15 Q Well, I'm going to --

16 A -- and how you're using it.

17 Q I'm going to construe that as a refusal  
18 to answer my question. I'll give you another  
19 opportunity to answer it.

20 On the day that you sat there in the  
21 courtroom watching Mr. Pilver's proceedings, did you  
22 have a feeling in your heart that you hated this guy  
23 -- Mr. Pilver?

24 MR. RODEMS: Object to the form.

25 A No.

1 Q Did you dislike Mr. Pilver as you sat in  
2 the courtroom that day?

3 MR. RODEMS: Object to the form.

4 A I suppose I would say, yes.

5 Q Why?

6 A He has caused great difficulty for me;  
7 denied me of my constitutional rights; prevented me  
8 from receiving the information that I sought to  
9 receive; and I know he was -- he's one of the -- one  
10 of the parties. But to me it was nothing other than  
11 I was there, and he happened to have a case on that  
12 day, some type of hearing. I don't think -- I think  
13 it was a very short hearing. I'm not even sure that  
14 the other party showed up.

15 Q Why did you stay? Why didn't you get up  
16 and walk out?

17 A Because that's what I was there for.

18 Q Which was what?

19 A To see court proceedings.

20 Q Weren't there other --

21 A I --

22 Q Go ahead.

23 A I regularly did that.

24 Q Weren't there other court proceedings  
25 going on that day in the massive courthouse

1        somewhere?

2            A        I suppose so, yes.

3            Q        Did it occur to you "Maybe I better walk  
4 out of the courtroom and go watch a different  
5 hearing today"?

6            A        No, that did not occur to me.

7            Q        So you were very comfortable sitting  
8 there watching Mr. Pilver's legal proceedings?

9            A        Just as I would anyone else, yes.

10          Q        Did you attempt to greet Mr. Pilver at  
11 any point during the proceedings or before or after  
12 the proceedings?

13          A        No, I did not.

14          Q        Why not?

15          A        No reason to.

16          Q        Did it occur to you --

17          A        And I didn't want any problems with him.

18          Q        Did it occur to you that maybe  
19 Mr. Pilver, if he had seen you in the gallery that  
20 day, might have been uncomfortable with your  
21 presence in his legal proceeding?

22          A        No.

23                    MR. TODD:    Chris, I'm done.

24                    MR. RODEMS:    Okay.    We'll read.

25                    MR. TODD:    Thank you, sir.

1 (At 10:54 a.m., no further questions  
2 were propounded to this witness.)  
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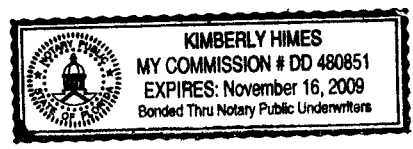
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COUNTY OF HILLSBOROUGH:

I, Kimberly Himes, Notary Public in and for the State of Florida at Large, do hereby certify that I reported in shorthand the foregoing proceedings at the time and place therein designated; that the witness herein was duly sworn by me; that my shorthand notes were thereafter reduced to typewriting under my supervision; and that the foregoing pages are a true and correct, verbatim record of the aforesaid proceedings.

Witness my hand and seal December 11, 2008, in the City of Tampa, County of Hillsborough, State of Florida.

*Kimberly Himes*  
\_\_\_\_\_  
Kimberly Himes  
Notary Public  
State of Florida at Large



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**RE:** HUNT VS. LAW LIBRARY BOARD

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