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SUPERIOR COURT OF WASHINGTON FOR _____ COUNTY

NAME,

Plaintiff,

vs.

TORTFEASOR,

Defendant.

NO.

**ORDER GRANTING PLAINTIFF'S
MOTION IN LIMINE**

THIS MATTER having come on regularly for hearing before the undersigned judge of the above entitled court upon the motion of Plaintiff, the court having heard oral argument, having reviewed the records and files and being duly advised, now, therefore, it is hereby

ORDERED, ADJUDGED AND DECREED that the defendant, his attorney and witnesses, shall not directly or indirectly mention, refer to, interrogate concerning, or attempt to convey to the jury in any manner any of the facts indicated below without first obtaining the permission of the court outside the presence and hearing of the jury and

further the defense attorney shall warn and caution his clients and each and every witness to strictly follow the court's order as follows:

GRANTED	DENIED	MOTION IN LIMINE
		Taxation. Any evidence relating to the facts that a recovery by Plaintiff would or would not be subject to taxation or that her income would or would not be subject to taxation.
		Lack of Insurance. Any suggestion to the jury that there is no insurance coverage or that the judgment would come "out of the pocket" of Defendant, or any reference to Defendant as an impecunious person.
		Lack of Injury. Any evidence or reference that Defendant or any of his passengers were not injured or any of Plaintiff's passengers were not injured.
		Prior Accidents. Any evidence or reference to any prior motor vehicle accidents on the part of Plaintiff.
		Prior L&I Claim. Any evidence or reference to any L&I claim filed by Plaintiff stemming from work injuries.
		Specifically the L&I medical exam. Any evidence or reference to any L&I medical exam which the state required Plaintiff to attend relating to work injuries.
		Evidence of Prior Unrelated Injuries or Medical Treatment. Any evidence or reference to Plaintiff's prior physical heath unless (a) such condition was symptomatic at the time of injury, or was (b) a latent pre-existing condition that was made active by the injury.
		Evidence of Children's Medical Condition. No reference

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		to any medical condition of any of Plaintiff's children.
		Failure to Call Witness. No reference to the failure of Plaintiff to call a doctor or any other witness, especially where such testimony would be cumulative.
		Prior Drug Use. No reference to Plaintiff's possible illegal drug use.
		Unavoidable Accident. Any evidence or reference insinuating that the accident was unavoidable.
		Absence of Police Report. No reference to whether police investigated the auto collision or not.
		Change of Attorneys. No reference to whether Plaintiff was previously represented by Marjorie Chalfant and/or Christopher Benson, or any other attorney.
		Hypothetical Medical Conditions. No reference or query as to whether Plaintiff was bleeding or suffered broken bones as a result of the auto collision.
		Undisclosed Evidence. Any witnesses, movies, photographs, or other evidence relating to the case previously requested but not disclosed during discovery.
		Exclusion of Witnesses. All non-party witnesses should be excluded from the courtroom during the course of trial so they cannot hear the testimony of other witnesses.
		Filing of Motion. The fact that plaintiff's motion was filed or any ruling made by the court regarding the motion or content thereof.

1 DATED this ____ day of _____.

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3 Judge _____

4 Presented by:

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7 Attorney for Plaintiff
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