

IN THE CIRCUIT COURT OF THE JUDICIAL DISTRICT OF
COUNTY, MISSISSIPPI

PLAINTIFF

V.

CAUSE NO.

DEFENDANT

MOTION IN LIMINE

COMES NOW the plaintiff, _____, and moves the Court through counsel to grant an order preventing the introduction of any writing, testimony, or inquiry being made by defendant or any of its witnesses or its attorney reflecting or showing the following:

1. **Criminal Conduct:** That plaintiff has been accused of, or in fact found guilty of, any misconduct or criminal activity. In this connection, plaintiff has never been convicted of any crime involving moral turpitude nor any other crime which would be admissible in impeachment of plaintiff's credibility.
2. **Personal Habits:** The plaintiff's personal habits, including drinking and/or drug habits, since there is no allegation that any such habits contributed to the occurrence made the basis of this suit, or that the plaintiff was intoxicated from drugs or alcohol at the time of said occurrence.
3. **Social Life:** Any reference to plaintiff's social life including any social relationships, living arrangements, or marital status past or present.
4. **Domestic Life:** That plaintiff has been married on more than one occasion, or any reference to previous marital difficulties, controversies relating to child custody or contribution, or marital claims, suits, or actions.

5. **Financial Status:** Any reference to the financial status of either party to this suit, especially any reference to defendant as a little person or unemployed person or small or struggling business.
6. **Payment of Judgment:** Any indication of any kind that defendant personally will have to pay any judgment entered in this case.
7. **Insurance Rates:** That no mention be made of the effect or results of a claim, suit or judgment upon the insurance rates, premiums, or charges, either generally or as particularly applied to the party in question a result of this or any other matter.
8. **Witnesses Not Called:** That the plaintiff has not called to testify any witness equally available to both parties in this case. In this connection, plaintiff moves that defendant's counsel further be instructed not to tender, read form, or refer to any ex parte statement or report of any person not then and there present in court to testify and to be cross-examined by counsel for plaintiff, and that defendant's counsel be instructed not to suggest to the jury by argument or otherwise what would have been the testimony of any witness not actually called.
9. **Police Officer as Accident Reconstructionist:** That any police officer or other investigating officer called to testify concerning the facts surrounding his investigation be precluded from giving an opinion as to the cause of the accident until the court, out of the jury's presence, has had the opportunity to determine whether said officer is qualified to give his opinion.
10. **Prior Unrelated Injuries:** That defendant not mention any prior noncompensable injuries, diseases, conditions, or illnesses which are wholly disassociated from and do not relate to or serve as a "sole cause" defense to the plaintiff's present claim for compensation, and which the defendant cannot medically associate and relate to the plaintiff's present condition.
11. **Collateral Sources of Compensation:** That no mention be made of the fact that the plaintiff received any compensation or benefits from the worker's compensation commission for a

prior injury, or under any other collateral source, including but not limited to, the following:

- a. Benefits from collateral insurance coverage;
- b. Services furnished without charge;
- c. Compensation for time not actually worked.
- d. In this connection, plaintiff says that such benefits are wholly collateral to any benefits that this plaintiff might be entitled to under the liability coverage of the defendant's policy.

12. **Photographs:** That should the defendant wish to introduce any photographs or motion pictures into evidence, that the same be tendered to Court and opposing counsel, outside the presence of the jury, and shown or exhibited to determine its relevance and suitability for introduction into evidence or tender into evidence by the defendant.

13. **Items in Plaintiff's File:** That the defendant be instructed not to make demands or requests before the jury for matters found or contained in plaintiff's file, which would include statements, pleadings, photographs, and other documents, nor to demand or request further additional medical examinations, physical demonstrations, or other request during the course of the trial and in the presence of the jury.

14. **Prior Collisions:** Any prior automobile collisions that plaintiff may have had in the past.

15. **Prior Demands or Offers:** Any reference to the contents or amounts demanded or mentioned in any pleading or ad damnum clause of the complaint or other pleading in this cause.

16. **Medical Authorization:** Whether or not plaintiff would sign a medical authorization form allowing the defendant to personally obtain copies of medical records.

17. **This Motion:** That this motion has been presented to or ruled upon by the Court. In this connection, plaintiff moves that defendant's counsel be instructed not to suggest to the jury by argument or otherwise that plaintiff has sought to exclude from proof any matter bearing on the issues in this cause or the rights of the parties to this suit.

18. The above mentioned evidence, if admitted, would seriously and gravely prejudice the rights of the plaintiff herein in this action without shedding light on the issues in the case at bar and the same is contrary to law.

RESPECTFULLY SUBMITTED,

, ATTORNEY
FOR PLAINTIFF

CERTIFICATE OF SERVICE

This is to certify that I, _____, attorney for Plaintiff, have this day hand delivered, a true and correct copy of the above and foregoing Motion in Limine, to Hon. _____, Attorney for Defendant.

This _____ day of _____, _____.

, ATTORNEY
FOR PLAINTIFF