

STATE OF MARYLAND

2016 JAN -4 P 3: 09N THE

v.

\* CIRCUIT COURT FOR

CRIMINAL DIVISION BALTIMORE CITY

\* CASE No. 115141032

CAESAR GOODSON

\* (Filed under seal)

\* \* \* \* \*

**STATE'S MOTION IN LIMINE TO PRECLUDE AS IRRELEVANT CERTAIN EVIDENCE CONTAINED IN THE DEFENDANT'S DECEMBER 24, 2015, SUPPLEMENTAL DISCLOSURE ABOUT AN UNRELATED ARREST THAT OCCURRED ON MAY 3, 2015**

Now comes the State of Maryland, by and through Marilyn J. Mosby, the State's Attorney for Baltimore City; Michael Schatzow, Chief Deputy State's Attorney for Baltimore City; Janice L. Bledsoe, Deputy State's Attorney for Baltimore City; and Matthew Pillion, Assistant State's Attorney for Baltimore City; and pursuant to Rule 4-252(d) moves this Court *in limine* to issue a pretrial order precluding the Defendant in this case from offering evidence about matters contained in the Defendant's December 24, 2015, supplemental disclosure concerning an unrelated arrest that occurred on May 3, 2015. In support of this Motion, the State submits the following:

1. On December 24, 2015, the Defendant supplementally disclosed an additional thirty-five pages of documents and records, four photographs, and three new videos that he intends to use at trial. The materials relate to the May 3, 2015, arrest of Mr. Paul L. in the Western Police District of Baltimore City and describe/depict an incident during the course of transporting Mr. L. inside a police transportation wagon in which Mr. L. allegedly struggled with police officers during the seatbelting process and managed to unbuckle his seatbelt.<sup>1</sup> Not only did this arrest occur subsequent to the arrest and death

<sup>1</sup> Given the media attention to this case, out of respect for the privacy of the arrestee who was the subject of the May 3 incident, the State will refer to him using a pseudonym but will gladly provide the Court for *in camera* review copies of the documents related to the arrest.

