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CRIMINAL DIVISION

STATE OF MARYLAND * IN THE
* CIRCUIT COURT
v. * FOR
OFFICER GARRETT MILLER * BALTIMORE CITY
* Case No.: 115141034

* * * * *

MOTION IN LIMINE TO PRECLUDE REFERENCE TO OR ARGUMENT ABOUT
MR. FREDDIE GRAY'S INITIAL DETENTION NOT BEING SUPPORTED BY
REASONABLE SUSPICION, MR. GRAY'S ARREST NOT BEING SUPPORTED BY
PROBABLE CAUSE, OR MR. GRAY'S SEIZURE NOT BEING OTHERWISE
LEGALLY JUSTIFIED

Defendant, Officer Garrett Miller, by undersigned counsel, pursuant to Maryland Rule 5-609, files this Motion in Limine to order the preclusion of any and all reference to or argument about Mr. Freddie Gray's initial detention not being supported by reasonable suspicion, Mr. Gray's arrest not being supported by probable cause, or Mr. Gray's seizure not being otherwise legally justified. In support, Defendant states the following:

The State seeks to introduce evidence and testimony and make arguments as to the legality of Mr. Freddie Gray's initial detention and/or arrest on April 12, 2015. The State may also seek to make reference to or argue about whether reasonable suspicion supporting that initial detention existed, whether and what probable cause existed, and the overall legality of Mr. Gray's seizure by law enforcement. Because Defendant Officer Miller had legal authority to seize Mr. Gray throughout the encounter on April 12, 2015, the State should be precluded from arguing or attempting to submit evidence to indicate otherwise,

