

STATE OF MARYLAND

\* IN THE

Plaintiff

\* CIRCUIT COURT

v.

\* FOR

ALICIA WHITE

\* BALTIMORE CITY

Defendant

\* Case No. 115141036

\* \* \* \* \*

**DEFENDANT'S RESPONSE TO STATE'S MOTION *IN LIMINE* TO PRECLUDE EVIDENCE OF, OR ARGUMENT ABOUT, OR REFERENCE TO CERTAIN INFORMATION REGARDING THE VICTIM**

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CIRCUIT COURT FOR  
BALTIMORE CITY  
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CRIMINAL DIVISION

Defendant Alicia White, through her counsel, opposes the State's Motion *in Limine* to Preclude Evidence of, or Argument About, or Reference to Certain Information Regarding the Victim (the "Motion"). Evidence regarding Mr. Gray's past conduct and medical history is relevant and should be admissible in the trial of this case.

The State moved *in limine* to broadly preclude any reference to "Mr. Gray's criminal record, prior encounters with law enforcement or corrections officials, prior criminal cases and representation in those cases, prior hospitalizations, prior civil claims or settlements, and/or lead paint exposure as a child." State's Mot. at 1. The State argues that the introduction of such evidence will "confuse, mislead, and prejudice the jury." State's Mot. at 1. The State's Motion should be denied. Information about Mr. Gray's criminal record, prior encounters with law enforcement or corrections officials, and prior hospitalizations is relevant to the charges against Sergeant White.

