**JUS-441 Topic 5 Memorandum to Smith**

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Ms. Danielle Smith

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MEMORANDUM

**Re: Case #4564-23 – Motion in Limine**

Dear Ms. Smith,

Per my requirements as your attorney to keep you reasonably informed of activities of your case, I am writing to inform you of recent activities of the Maricopa County prosecuting attorney, Mr. Craig Lawford (AZ Bar License #45425).

I regret to inform you that you that Mr. Lawford intends to file with Judge Mindleson copies of certain nude photographs [prosecutor’s proposed exhibit 7] that you took of your children as evidence of your alleged sexual molestation of your children, Jonathan and Mindy.

I believe these photographs are in violation of Arizona Rules of Civil Procedure, as the photographs are unduly prejudicial and are not probative of the ultimate issues of fact in the case. It is my contention that they are just the types of photographs a parent might take of their infant/toddler children while bathing.

Accordingly, I will be filing a Motion of Limine. A motion of Limine is a motion filed by an attorney requesting that a judge suppress and or exclude evidence from a court case because of a variety of reasons, including needless presentation of cumulative evidence, that the evidence is unduly prejudicial, that it is needless cumulative, etc.

I will keep you informed of the outcome of that motion. Please find a copy of that motion enclosed for your review.

As I reminder, I plan on still meeting with you on the 9th at 11:00 a.m. for our face-to-face meeting concerning our plan of action regarding your case. Please be sure to attend this meeting.

Sincerely,

John Jameson, Esq.

Bar License #23542