

CAUSE NUMBER _____

IN THE MATTER OF _____) (IN THE _____
) (_____ COUNTY, TEXAS
) (SITTING AS A JUVENILE COURT

STATE'S MOTION IN LIMINE

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the State of Texas by and through her Criminal District Attorney for _____ County, Texas, prior to jury selection in the above entitled and numbered cause and requests that the Court direct the Respondent, and counsel for the Respondent, and all of Respondent's witnesses, not to mention, refer to, interrogate concerning, or bring to the attention of the jury or venire in any manner directly or indirectly any of the following matters **without first approaching the bench** and obtaining a ruling on their admissibility for the reason that the mere mention of such matters would be error and would harm and prejudice the right of the State of Texas and the injured party to a fair trial. Further, the harm and prejudice created thereby could not completely be cured by an instruction to disregard.

1. Any mention of evidence of character, arrests, bad conduct or convictions of any of the State's witnesses.
2. Any mention of allegations or evidence of prior sexual conduct by the victim, until or unless such evidence is shown to be admissible pursuant to Rule 412 of the Texas Rules of Evidence.
3. Any mention of statements, admissions or denials made by the Respondent to the police, witnesses or Child Protective Services.
4. Any mention of allegations or evidence of the victim's family or any of the state's witnesses' or their families' prior dealings with Child Protective Services.
5. Any mention of mental disease or defect on the part of the Respondent or psychiatric counseling or treatment of the Respondent.

6. Any mention of any expert witness or his opinions without first affording the State an opportunity to conduct an examination of said witness pursuant to Rule 705(b) of the Texas Rules of Criminal Evidence.
7. Any mention by any expert or lay witness of an opinion as to the guilt or innocence of the Respondent or as to the proper punishment for the Respondent in this case.
8. Any mention or reference to any plea bargain offer by the State in this case.
9. Any mention as to what detention, jail or prison life is like.
10. Any mention to any time spent in detention, jail or in a psychiatric facility by this Respondent.
11. Any mention of registration as a sex offender or notification to school districts.

WHEREFORE, PREMISES CONSIDERED, the State requests this Motion in Limine be granted and the Respondent, the counsel for the Respondent and all of the Respondent's witnesses be instructed not to allude to or mention any of the above subjects until a ruling can be obtained from the Court outside the presence of the jury.

Respectfully submitted,

 _____, Assistant
 Criminal District Attorney
 _____ County, Texas
 Bar Code Number: _____

ORDER

The above State's Motion in Limine is hereby GRANTED ____ / DENIED ____ on this the ____ day of _____, 20__.

 PRESIDING JUDGE