

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

NATIONAL FEDERATION OF THE BLIND, *et al.*,

Plaintiffs,

v.

Case No. 3:23cv127

VIRGINIA DEPARTMENT OF CORRECTIONS,

Defendant.

**MOTION IN LIMINE TO EXCLUDE THE
EXPERT TESTIMONY OF RICHARD WELLS**

The Virginia Department of Corrections (“VDOC”), by counsel, hereby submits this Motion *In Limine*. For the reasons set forth in the accompanying memorandum, VDOC respectfully requests that the Court exclude or limit the testimony of Plaintiff’s expert witness Richard Wells.

Respectfully submitted,

VDOC.

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CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of April, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record for the Plaintiff.

/s/ Timothy E. Davis

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