

**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 SUBIA**

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 Subia.

Respectfully submitted,

VDOC.

By: /s/ Timothy E. Davis
Timothy E. Davis, AAG, VSB #87448
Office of the Attorney General
Criminal Justice & Public Safety Division
202 North 9th Street
Richmond, Virginia 23219
(804) 225-4226
(804) 786-4239 (Fax)
Email: tdavis@oag.state.va.us

 /s/ Ann-Marie White Rene
Ann-Marie Rene, AAG, VSB #91166
Office of the Attorney General
Criminal Justice & Public Safety Division
202 North 9th Street
Richmond, Virginia 23219

(804) 371-2084
(804) 786-4239 (Fax)
E-mail: arene@oag.state.va.us

s/ Andrew R. Page
Andrew R. Page, VSB #80776
Assistant Attorney General
Office of the Attorney General
Criminal Justice & Public Safety Division
202 North Ninth Street
Richmond, Virginia 23219
Phone: (804) 692-0618
Fax: (804) 786-4239
Email: arpage@oag.state.va.us

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
Timothy E. Davis, AAG, VSB#87448
Office of the Attorney General
Criminal Justice & Public Safety Division
202 North 9th Street
Richmond, Virginia 2321
(804) 225-4226
(804) 786-4239 (Fax)
Email: tdavis@oag.state.va.us