

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

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

Plaintiffs,

Case No. 3:23-cv-127-HEH

v.

VIRGINIA DEPARTMENT OF  
CORRECTIONS, *et al.*,

Defendants.

**PLAINTIFFS' MOTION *IN LIMINE* TO PRECLUDE EVIDENCE OF (1) PLAINTIFFS' CRIMINAL HISTORIES; (2) PLAINTIFFS' DISCIPLINARY INFRACTIONS OR OTHER ALLEGED "BAD ACTS"; (3) PLAINTIFFS' ALLEGED DRUG USE; (4) PLAINTIFFS' ALLEGED GANG AFFILIATIONS; AND (5) ALLEGATIONS OF SEXUAL MISCONDUCT AT THE NATIONAL FEDERATION OF THE BLIND**

Plaintiffs, by and through undersigned counsel, hereby move this Court to preclude Defendant from offering, or eliciting on cross-examination, any irrelevant and prejudicial evidence about (1) Plaintiffs' criminal histories; (2) Plaintiffs' prison disciplinary infractions or other alleged "bad acts;" (3) Plaintiffs' alleged drug use; (4) Plaintiffs' alleged gang affiliations; and (5) allegations of sexual misconduct at the National Federation of the Blind, all of which are inadmissible under Federal Rules of Evidence 609, 402, and 403. The grounds for requesting this relief are set forth in the accompanying Memorandum.

Dated: May 6, 2024

Respectfully submitted,

/s/ Samantha Westrum

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 6th day of May 2024, I filed the foregoing electronically with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (“NEF”) to the following:

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I hereby certify that I will mail the foregoing document by U.S. Mail and electronic mail to the following non-filing user:

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