

IN THE IOWA DISTRICT COURT FOR WOODBURY COUNTY

JERRI TINKER, Plaintiff, v. PHILIP J. HAEFS, Defendant.	CASE NO: LACV167801 DEFENDANT'S FIRST MOTION IN LIMINE
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COMES NOW the Defendant, Philip Haefs, before trial and before the selection of the jury, hereby moves in limine that the Court issue an Order precluding the Plaintiff, her witnesses and her attorney from presenting argument, testimony or evidence on the following without first obtaining permission from the Court outside of the presence of the jury.

1. Evidence of Defendant's liability insurance coverage.
2. Evidence of Plaintiff's damages not disclosed to the Defendant within thirty days of the trial of this matter.
3. Opinion testimony from any lay witness related to the causation, treatment or prognosis of any of Plaintiff's claimed injuries.
4. Evidence that purports to be a hearsay statement from a physician or other healthcare professional related to the causation, treatment or prognosis of any of Plaintiff's claimed injuries.
5. Evidence of Plaintiff's medical expenses without foundation provided by an expert qualified to testify that such expenses are causally related to the accident at issue in this case.

WHEREFORE, the Defendant Philip Haefs requests that the Court issue an Order precluding the Plaintiff, her witnesses and her attorney from presenting argument, evidence or testimony about the above items without first obtaining permission from the Court outside of the presence of the jury.



Scott K. Green AT0002929
4200 Corporate Drive, Suite 120
West Des Moines, IA 50266
Phone: (515)224-1555, x60111
Fax: (877) 888-1482
sgreen@amfam.com
ATTORNEY FOR DEFENDANT
PHILLIP HAEFS

Original filed
Copy to:
KEN A. WINJIM
1220 SUNSET DRIVE, SUITE 103
NORWALK, IA 50211
kwinjim@hminjurylaw.com
ATTORNEY FOR PLAINTIFF

PROOF OF SERVICE

The undersigned certifies that the foregoing instrument was served by EMDS upon all parties to the above cause to each of the attorneys of record herein at their respective addresses disclosed on the pleadings, on this 27th day of September, 2016.

