

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

<p>TRACY WHITE,  Plaintiff,  vs.  STATE OF IOWA and IOWA DEPARTMENT OF HUMAN SERVICES,  Defendants.</p>	<p>Case No. LACL146265  <b>PLAINTIFF'S SECOND MOTION IN LIMINE</b></p>
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COMES NOW the Plaintiff and requests that the following:

**1. Sequestering Witnesses**

Plaintiff understands that the upcoming trial will be available to watch over live video, both in the hallway of the courthouse and over the internet. Because the availability of this live feed, Plaintiff seeks the sequestering of all witnesses who have not yet testified in order to prevent later witnesses from tailoring his or her testimony to that of a prior witness and to assist the finder of fact in detecting unreliable testimony. *See, e.g.,* Fed. R. Evid. 615. Plaintiff also seeks the assurance of counsel that they will not allow witnesses who have not yet testified access to the video feed. Plaintiff's counsel will provide the same assurance.

**2. Attorney Chandlor Collins and Witness Mary Collins**

It is Plaintiff's counsel's understanding that Defendants' Attorney Chandlor Collins is the spouse of witness Mary Collins, a prior DHS employee who was called "eye candy" by another DHS employee. Plaintiff does not believe that either party plans to call Ms. Collins as a witness. However, assuming Plaintiff's understanding of the relationship between Mr. Collins and Ms. Collins is accurate, Plaintiff requests the Court prohibit comment, argument, evidence, or testimony concerning the relationship as it is irrelevant and may confuse or mislead the jury. *See* IOWA R. EVID. 5.403.

**3. Tracy White's Prior Attorney**

