

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS

SUPERIOR COURT
CIVIL ACTION NO. 9005286

_____)
THOMAS SHAY,)
DEFENDANT)
)
V.)
)
JEFFREY S. BERRY,)
AND BER-GIAM, INC.,)
PLAINTIFF)
_____)

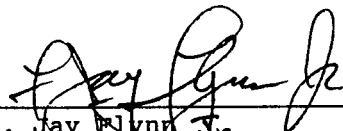
PLAINTIFF'S MOTION IN LIMINE TO EXCLUDE EVIDENCE
THAT THOMAS A. SHAY HAS BEEN HELD BY THE
COMMONWEALTH ON CRIMINAL CASES

Now comes the Plaintiff and moves this Court to exclude evidence that Thomas A. Shay, son of Plaintiff, has been held by the Commonwealth on criminal cases.

In support hereof, Plaintiff states that upon information and belief, Thomas A. Shay is being held in lieu of bail at the Nashua Street Jail on process from Suffolk Superior Court.

This motion is supported by grounds that such information is not relevant, is prejudicial, and since Thomas A. Shay has not been convicted of the crime that he is currently held on, it is inadmissable.

Dated: 9/14/92



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