

IN THE CIRCUIT COURT, FOURTH  
JUDICIAL CIRCUIT, IN AND FOR  
DUVAL COUNTY, FLORIDA.

CASENO.: 16-2012-CF-011572

DIVISION: CR-D

STATE OF FLORIDA

VS.

MICHAEL DAVID DUNN  
\_\_\_\_\_ /

**DEFENDANT'S MOTION IN LIMINE**  
**REGARDING MISCELLANEOUS PHOTOGRAPHS**

The Defendant MICHAEL DUNN, by and through undersigned counsel, moves this Honorable Court to enter its Order in *Limine* restricting the admission at the trial of this cause of certain inflammatory photographs; and would show:

The State, through apparent access to the Defendant's isolation cell and some employee or agent of the Sheriff's Office, has taken several photographs to journal alleged drawings inside said cell in the instant case, and plans on introduction of same. There is no possible evidentiary predicate or foundation for these alleged drawings now at issue, and said photographs, other than with any possible specific eye-witness and use of an alleged admission against defendant, would be irrelevant, improper and unfairly prejudicial.

Wherefore, the Defendant, MICHAEL DUNN, respectfully prays that this Honorable Court enter its Order excluding the above-described photographic evidence at the trial of this cause; or, in the alternative, conducting an *in camera* examination of the specific photographic evidence which the prosecution seeks to offer at the trial in this cause, and place narrow restrictions on the introduction and use of such evidence.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to the Office of the State Attorney, Duval County, 220 East Bay St., Jacksonville, Florida 32202 by Efile, Email, Hand Delivery or Facsimile this 2nd September, 2014.

Office of Jeffrey E. Lewis  
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