

CAUSE NO. Xxx

THE STATE OF TEXAS	§	IN THE DISTRICT COURT
V.	§	OF
xxx	§	HAYS COUNTY, TEXAS

**MOTION IN LIMINE:**  
**PRESENTATIONS TO THE JURY**

TO THE HONORABLE JUDGE OF SAID COURT:

xxx, Defendant, by and through his attorney Paul C. Looney, respectfully moves the Court to instruct the State not to show any presentations, demonstrative exhibits, or visual aids to the jury until the Defense has had the opportunity to view them and ensure that they are appropriate.

It has been noted that the State routinely uses electronic presentations during voir dire that include objectionable material. This is doubly problematic. First, as the Defense generally does not see these presentations prior to the venire panel, by the time the Defense has the opportunity to object any harm has already been done. Secondly, defense counsel cannot watch the screen without looking away from the venire, which damages the right of the Defendant to a fairly selected jury. These problems can be cured by requiring the State to show all presentations to defense counsel prior to showing them to the venire members or jurors.

WHEREFORE, PREMISES CONSIDERED, the undersigned hereby urges that this *Motion* be granted, in all things, and that the Court order the State not to reveal any electronic presentations, demonstrative exhibits or visual aids to the jury without first providing copies of same to Defense Counsel and obtaining a ruling on the admissibility of such evidence outside the presence of the jury.

Respectfully submitted,

By: \_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

This is to certify that on May 7, 2013, a true and correct copy of the foregoing Motion was either properly mailed or hand-delivered to the District Attorney of Hays County, Texas.

\_\_\_\_\_  
Paul C. Looney

CAUSE NO. xxx

THE STATE OF TEXAS  
V.  
xxx

§  
§

IN THE DISTRICT COURT  
OF

**ORDER**

On this day the Court finds that the foregoing *Motion in Limine: Presentations to the Jury* should be granted.

IT IS THEREFORE ORDERED, ADJUDGED that the State shall not reveal any electronic presentations, demonstrative exhibits or visual aids to the jury without first providing copies of same to Defense Counsel and obtaining a ruling on the admissibility of such evidence outside the presence of the jury.

SIGNED \_\_\_\_\_, 2013.

\_\_\_\_\_  
JUDGE PRESIDING