

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

HERBERT L. MITCHELL	:	
	:	
VS.	:	NO. 3:02CV2136(AVC)
	:	
MAURICE L. COLLIN,	:	
TASI VRIGA,	:	
EUGENE A. MIGLIARO, JR.	:	
and CHRISTOPHER DUNN	:	AUGUST 10, 2004

BRIEF IN OPPOSITION TO MOTION IN LIMINE

The defendants have moved in limine to preclude the plaintiff from presenting any evidence that he was the victim of an assault on June 21, 2002, to preclude him from presenting any evidence concerning the concealment of this criminal wrongdoing by the defendants and other state officials, to preclude him from presenting any evidence concerning his layoff in the year 2003, and to preclude him from presenting any evidence concerning denial of due process in connection with him employment on dates subsequent to July 23, 2002.

All of these issues are, or may be, essential to show the background of the events which this Court has ruled are the proper subject of the litigation or to showing the state of mind of the defendants, or to show a continuing course of unconstitutional conduct by the defendants. These issues will become more

apparent both to the Court and to the parties as the trial goes forward. Accordingly, although the motion should be denied, a ruling on the motion should be deferred until the time of trial so the Court and the parties can assess this motion in the context of the trial.

Respectfully submitted:

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Plaintiff's Attorney

CERTIFICATION OF SERVICE

On the date above stated, a copy hereof was mailed to Joseph A. Jordano, Esq., Assistant Attorney General, P. O. Box 120, Hartford, CT 06141-0120.

JOHN R. WILLIAMS