

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

FREE SPEECH COALITION, INC. et al.,)
) Civil Action No. 2:09-4607
)
Plaintiffs,) Judge Michael M. Baylson
)
v.)
) DEFENDANT’S MOTION TO
THE HONORABLE ERIC H. HOLDER, JR.,) EXCLUDE THE TESTIMONY
Attorney General,) OF DANIEL LINZ, MICHELLE
) DROUIN, AND MARC ZIMMERMAN
Defendant.)
)

Pursuant to Fed. R. Evid. 702, Defendant hereby moves, *in limine*, to exclude the testimony of Plaintiffs’ proposed experts, Daniel Linz, Michelle Drouin, and Marc Zimmerman, on the subjects identified in their respective expert reports, on the grounds that the proposed testimony of these individuals is inadmissible under the applicable standards for expert testimony. In further support of this Motion, Defendant offers the accompanying Memorandum of Law, exhibits filed herewith, and the entire record in this case.

Dated this 15th day of May, 2013.

Respectfully submitted,

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Acting Assistant Attorney General
ZANE DAVID MEMEGER
United States Attorney
ANTHONY J. COPPOLINO
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/s/ Héctor G. Bladuell
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CERTIFICATE OF SERVICE

Pursuant to Local Rule 5.1.2(8)(b), I hereby certify that the foregoing Motion has been filed electronically and is available for viewing and downloading from the ECF system. I further certify that the foregoing document was served via ECF on counsel of record for plaintiffs in the above-captioned case.

Dated: May 15, 2013

/s/

Héctor G. Bladuell