

EXAMPLE #3

<insert counsel information  
here>

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

<insert case caption>

<insert case number>

**JOINT SUBMISSION OF  
MOTIONS IN LIMINE**

Pursuant to the Jury Trial Management Order, the parties have conferred and agreed upon the following checklist of motions in limine for the court to consider:

<b>Plaintiffs' Motions in Limine</b>		
<b>No.</b>	<b>Title of Motion in Limine</b>	<b>Ruling</b>
1	Plaintiffs move <i>in limine</i> to exclude evidence of defendants' actual or projected profits or losses after seizing the assets of FTB.	
2	Plaintiffs move <i>in limine</i> to exclude discussions of, or reference to, settlement communications between plaintiffs and defendants made after April 15, 2009.	
3	Plaintiffs move <i>in limine</i> to exclude evidence of FTB's payments to the Ryans.	
4	Plaintiffs move <i>in limine</i> to exclude evidence of post-asset seizure negotiations between counsel.	
5	Plaintiffs move <i>in limine</i> to exclude evidence of defendants' attorney fees.	

<b>Defendants' Motions in Limine</b>		
<b>No.</b>	<b>Title of Motion in Limine</b>	<b>Ruling</b>
1	The Court should exclude any evidence or argument that plaintiff is entitled to damages for more than the assets and equipment that FTUSA moved from the Boeckman Facility on March 27, 2009.	
2	The Court should exclude evidence of FTUSA's net worth unless and until plaintiff proves clear and convincing evidence entitling it to an award of punitive damages.	

<b>Defendants' Motions in Limine</b>		
<b>No.</b>	<b>Title of Motion in Limine</b>	<b>Ruling</b>
3	The Court should exclude the use of the phrase "Snatch and Grab" or words such as "raid" or "covert" or "theft" or other such hyperbole to describe the movement of the equipment.	
4	The Court should exclude any evidence or argument regarding plaintiff's now-dismissed Claim Eight of Breach of Contract.	
5	The Court should exclude any evidence or argument by plaintiff of what Kenny Gilman allegedly said to Mr. Ryan about putting Builders out of business if it competed.	
6	The Court should exclude any evidence of FTUSA's history of suing any other entities or individuals or evidence of FTUSA's history of getting sued by any entity or individual.	
7	The Court should exclude any evidence regarding FTUSA's status as a foreign corporation.	
8	The Court should exclude any evidence supporting an unpleaded claim of trespass to chattels rather than plaintiff's pleaded claim of trespass to land.	
9	The Court should exclude any evidence of Mark Ryan's appraisals regarding Builders' value, including but not limited to any evidence supporting Mr. Ryan's defective methodology which assumes an ongoing business relationship with FTUSA.	
10	The Court should exclude any argument or evidence of FTUSA's early estimates of the value of Builders and of Builders' equipment.	
11	The Court should exclude any evidence inquiring into attorney client privileged communications or that would reveal to the jury the waiver or nonwaiver of evidence subject to such privilege.	
12	The Court should exclude any evidence or opinion indicating or implying that the Internal Revenue Service might accept less than the full amount of its \$994,347 lien in satisfaction of Builders' debt.	
13	The Court should exclude any evidence regarding the alleged misrepresentation for the fraud claim aside from FTUSA's statement of its intention to lease the Boeckman Facility on a month-to-month basis.	
14	The Court should exclude any evidence that FTUSA failed to pay Builders the same that FTUSA paid Grass Valley.	

<b>Defendants' Motions in Limine</b>		
<b>No.</b>	<b>Title of Motion in Limine</b>	<b>Ruling</b>
15	The Court should exclude evidence or argument that the lease was important part of the deal.	
16	The Court should exclude any evidence or argument suggesting or implying that FTUSA had a duty of good faith during the parties' negotiations.	
17	The Court should exclude any evidence or argument related to <i>University of Oregon v. Fidelity &amp; Deposit Company of Maryland</i> , Lane County Circuit Court Case No. 160927390.	

DATED this 10th day of January, 2012.

<insert signatures of all counsel>