



FILED
LEWIS COUNTY
THE HONORABLE JAMES W

2022 MAY 23 AM 10:27
Date of Hearing: June 1, 2022 @ 9:00 a.m.

SUPERIOR COURT
CLERK'S OFFICE

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON, LEWIS COUNTY

SCOTT HAMILTON, as guardian ad litem for
Z.H.,

Plaintiffs,

vs.

LINDA AMONDSON-MULLER, Personal
Representative of the ESTATE of LAURA
HAMILTON,

Defendants.

NO. 20-2-00543-21

(PROPOSED) ORDER ON
PLAINTIFF'S MOTIONS *IN*
LIMINE

THIS MATTER came before the Court on Plaintiff's Motions *in Limine*. The Court has considered the files and pleadings herein, and hereby Grants (G), Denies (D), or Reserves Ruling (R) as follows:

| NO. | MOTION | G | D | R |
|-----|--|---|---|---|
| 1. | The Defense Should Be Precluded From Using The Name Zack | | | |
| 2. | Act of God | | | |
| 3. | Exclude Testimony Of Personal Representative | | | |

ORDER ON PLAINTIFF'S
MOTIONS *IN LIMINE* - 1

OSBORN MACHLER
2025 1st Ave., Ste. 1140
Seattle, WA 98121
206-441-4110 (Tel)
206-441-4220 (Fax)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

| NO. | MOTION | G | D | R |
|-----|--|---|---|---|
| 4. | Sidebar Remarks | | | |
| 5. | Display and Publishing of Exhibits | | | |
| 6. | Objections to Discovery and/or Discovery Disputes | | | |
| 7. | Witnesses and Evidence Not Previously Disclosed | | | |
| 8. | Consulting Experts | | | |
| 9. | Filing of Motion | | | |
| 10. | Absent Witnesses/ Failure to Call Witness | | | |
| 11. | The Court Should Require 24-Hour Notice of Live Witnesses | | | |
| 12. | Defendant's Financial Status, Insurance, or Policy Limits | | | |
| 13. | Effect of Jury Verdict on Insurance Rates or Cost of Medical Care | | | |
| 14. | All References to Income Tax Should Be Excluded | | | |
| 15. | Plaintiffs' Financial Status or "Secondary Gain" | | | |
| 16. | No References to How Plaintiffs Might Use the Proceeds of Any Judgment | | | |
| 17. | Attorneys' Fees, Employment of Lawyer, And Advice of Counsel | | | |
| 18. | Opinions Regarding the Truthfulness of Witnesses | | | |
| 19. | Vouching Testimony | | | |
| 20. | "Golden Rule" Argument Prohibited | | | |

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

| NO. | MOTION | G | D | R |
|-----|--|---|---|---|
| 21. | Jury Nullification | | | |
| 22. | Personal Opinion | | | |
| 23. | Preclude Admission of Medical Records | | | |
| 24. | Experts Referencing Evidence Ruled Inadmissible | | | |
| 25. | Evidence Not Disclosed by Defendants in Response to Plaintiffs' Discovery Requests | | | |
| 26. | Collateral Sources | | | |
| 27. | Disclosure of Illustrative and Demonstrative Exhibits | | | |
| 28. | Events From Dr. Freeman's Past | | | |
| 29. | Dr. Freeman's Amicus Brief | | | |
| 30. | Dr. Gurewitsch Allen's Brachial Plexus Case | | | |
| 31. | Dr. Allen and Dr. Gurewitsch Allen's Marriage And Daughter | | | |
| 32. | Prohibition Regarding Reputation of Defendant | | | |
| 33. | Abortions | | | |
| 34. | Religious Beliefs Or Political Views | | | |
| 35. | Failure to Mitigate Damages | | | |
| 36. | Appellate Action | | | |
| 37. | Juror Names | | | |
| 38. | Remarks or Argument About the Age or Inexperience of Counsel | | | |
| 39. | Preclude Testimony or Argument About Midwives in Other Countries | | | |

| | | | | |
|-----|-------------------------------------|--|--|--|
| 40. | Seng Hamilton's Attorney Discipline | | | |
| 41. | Marital Difficulties | | | |

DATED this ____ day of June, 2022.

 JUDGE JAMES W. LAWLER

Presented By:

OSBORN MACHLER



 Susan Machler, WSBA #23256
 Simeon J. Osborn, WSBA #14484
 Austin Neff, WSBA #57059
 2025 1st Ave., Ste. 1140
 Seattle, WA 98121
 Phone: (206) 441-4110
 Fax: (206) 441-4220
 Email: sosborn@osbornmachler.com
smachler@osbornmachler.com

Attorneys for Plaintiffs