

ELECTRONICALLY FILED
Superior Court of California,
County of San Diego
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Clerk of the Superior Court
By Treva Cutts, Deputy Clerk

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Attorneys for Plaintiff/Cross-Defendant LARRY GERACI and
Cross-Defendant REBECCA BERRY

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN DIEGO, CENTRAL DIVISION

LARRY GERACI, an individual,
Plaintiff,

v.

DARRYL COTTON, an individual; and DOES 1
through 10, inclusive,
Defendants.

DARRYL COTTON, an individual,
Cross-Complainant,

v.

LARRY GERACI, an individual, REBECCA
BERRY, an individual, and DOES 1
THROUGH 10, INCLUSIVE,
Cross-Defendants.

Case No. 37-2017-00010073-CU-BC-CTL

Judge: Hon. Joel R. Wohlfeil
Dept.: C-73

**PLAINTIFF/CROSS-DEFENDANTS'
NOTICE OF MOTION AND MOTION IN
LIMINE TO EXCLUDE REFERENCE TO
MR. HURTADO'S ALLEGATIONS THAT
MR. GERACI "SCREWED SOME OTHER
GUY, AND THE GUY COMMITTED
SUICIDE AND SHOT HIMSELF
BECAUES HE LOST HIS LIFE SAVINGS
AND EVERYTHING"**

[MIL NO. 8 OF 15]

[IMAGED FILE]

Complaint Filed: March 21, 2017
Trial Date: June 28, 2019

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD HEREIN:

PLEASE TAKE NOTICE that on June 28, 2019 at 8:30 a.m. or as soon thereafter as the
matter may be heard in Department C-73 of the San Diego Superior Court, located at 330 West
Broadway, San Diego, California, Plaintiff/Cross-Defendant, LARRY GERACI, and Cross-
Defendant, REBECCA BERRY, will move *in limine* pursuant to Evid. Code §§ 210, 350, 352, 703,
and 1101(a) for orders precluding any evidence, examination, argument or other reference to Mr.

1 Cotton and Mr. Hurtado's allegations that Mr. Geraci "screwed some other guy, and the guy
2 committed suicide and shot himself because he lost his life savings and everything."

3 This motion will be based on this Notice of Motion, the Memorandum of Points and
4 Authorities, and Notice of Lodgment served and filed herewith, on the records and file herein, and
5 on such evidence as may be presented at the hearing of this motion.

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7 FERRIS & BRITTON
A Professional Corporation

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9 Dated: June 20, 2019

10 By: Scott H. Toothacre
11 Michael R. Weinstein
12 Scott H. Toothacre
13 Attorney for Plaintiff and Cross-Defendant LARRY
14 GERACI and Cross-Defendant REBECCA BERRY
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