

The State of New Hampshire

Hillsborough, SS.

NH Superior Court

Hills. - Southern District

Case No. 226-2019-CR-0814

State of New Hampshire

v.

Dale E. Holloway Jr.

Motion in Limine to Prohibit Any Testimony of
Gang References (including Latin Kings, Cathedral
Projects, Mappagan Street, ETC.) at Trial (Guilt Phase)

Now Comes the Defendant, Dale E. Holloway Jr., Pro se,
pursuant to NH R. Evi. Rules (Subpart I - II), under
both state and federal constitutions that protect
rights of accused, and guarantee equal protec-
tion of the law, who respectfully submits this
Motion in Limine to Prohibit Any Testimony of Gang
References (including Latin Kings, Cathedral pro-
jects, Mappagan Street, ETC. at Trial (Guilt Phase)
for the following:

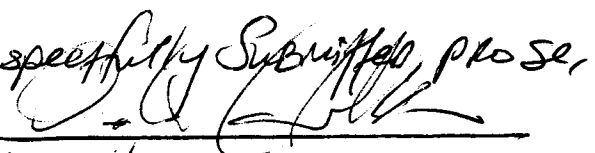
1. The Defendant, Dale E. Holloway Jr., is charged with
two (2) counts of attempted murder, and other related

Assault offenses, for an alleged shooting incident at
A Church in Pelham.

2. Mr. Holloway Requests that the Trial Court BARS OR
PROHIBITS ANY REFERENCES TO GANGS OR TERMS SYNON-
YMOUS WITH GANGS BECAUSE THE TERMS ARE INHERENTLY
INFLAMMATORY, THERE HAS BEEN NO DISCOVERY ABOUT GANGS,
AND THUS THE SUBJECT HAS NO RELEVANCE TO THE ISSUES AT
TRIAL. SEE ECHAVARRIA V. ROACH, 2022 U.S. DIST. LEXIS 84042.

Wherefore, the Defendant respectfully requests that this
Honorable Court GRANTS THE MOTION IN LIMINE TO
PROHIBIT ANY TESTIMONY OF GANG REFERENCES (INCLUDING
LATIN KINGS, CATHERAL PROJECTS, MATTAPAN STREET, ETC)
AT TRIAL (GUILTY PHASE), UNDER N.H.R. EVID. RULE 104.

Any other such relief the Court deems fair and just.

Respectfully Submitted, pro se,


Date E. Holloway Jr. #117157

NHSP-M

P.O. Box 14

CONCORD, NH 03301

Dated September 24, 2023

The State of New Hampshire

Hillsborough, SS.

NH Superior Court
Hills. - Southern District
Case No. 200-2019-CF-0814

State of New Hampshire

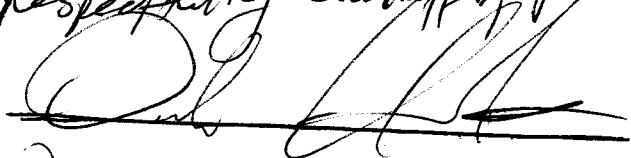
v.

Dale E. Holloway Jr.

Affidavit to Support

Under Oath, I Dale E. Holloway Jr. Herby Depose
AND State that the following statements are
True AND Accurate:

1. I AM THE DEFENDANT, PRO SE, IN THE ABOVE MATTER.
2. I AM INDIGENT AND CANNOT AFFORD PRIVATE COUNSEL
FOR MY REPRESENTATION.
3. I AM INCARCERATED AT NHSP-M, IN CONCORD, NH,
SERVING 7 1/2 - 15 YEARS WHILE PENDING TRIAL IN
THE ABOVE CASE.

Respectfully Submitted, Please,


Dale E. Holloway Jr. # 117157

NHSP-M

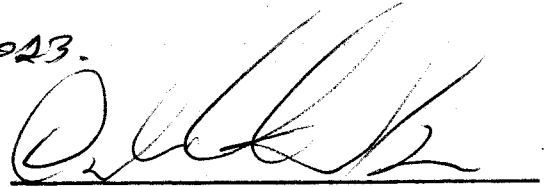
P.O. Box 14

CONCORD, NH. 03301

Date: September 28, 2023

Certificate of Service

I, Dale E. Holloway Jr. do certify that the enclosed has been sent via usps, per NADOC "Free Legal Mail" policy, to the Clerk's office of Hillsborough County - Southern District 30 Spring Street, Nashua, N.H. 03060, for the State, on this 28th Day of September 2023.



Dale E. Holloway Jr. #117157

NHSP-M

P.O. Box 14

281 N. State Street

Concord, NH, 03301