

The State of New Hampshire

Hillsborough, SS.

NH Superior Court  
Hills - Southern District  
Case No. 226-2019-CR-0814

State of New Hampshire

v.

Dele E. Holloway Jr.

Motion in Limine to Prohibit ANY Testimony of "PORN-  
OGRAPHY", "PORN BUSINESS", "PORN FILMS" or "PORN STARS"  
AT TRIAL (Guilt Phase)

Now Comes the Defendant, Dele E. Holloway Jr., prose,  
pursuant to NH R. Evi. Rules (Subparts I-II), under  
both state and federal constitutions that provide  
rights of accused and guarantee equal protection  
of the law, who respectfully submits this Motion in  
Limine to Prohibit ANY Testimony of "PORNOGRAPHY",  
"PORN BUSINESS", "PORN FILMS" or "PORN STARS" AT TRIAL (Guilt Phase)  
for the following:

1. The Defendant, Dele E. Holloway Jr. is Accused of  
Two (2) counts of Attempted Murder Charges, and  
other related (NON-SEXUAL) assault offenses, for

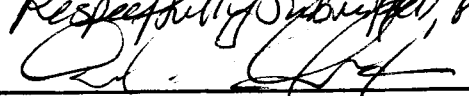
An "Alleged" Shooting incident at a church, in pelham.

2. The State Received A Voicemail from AN ANONYMOUS CALLER, later identified as Kimberly Woodbury, who was concerned with Explicit photos that could be on Mr. Holloway's phone. See (attached) Interview.

3. MR. Holloway Requests that this Trial Court BARS OR PROHIBITS ANY TESTIMONY OF PORNOGRAPHY, PORN BUSINESS, PORN FILMS, OR PORN STARS AT TRIAL, AS THERE IS NO DISCOVERY ABOUT PORN, AND THUS THE SUBJECT HAS NO RELEVANCE TO THE ISSUES AT TRIAL, PURSUANT TO NH R. Evi. 404 (b)(1). See STATE V. THOMAS, 168 NH 589, 599, 134 A.3d 1 (2016)

Wherefore, the Defendant respectfully Requests that this Honorable Court GRANTS THIS MOTION IN LIMINE TO PROHIBIT ANY TESTIMONY OF "PORNOGRAPHY," "PORN BUSINESS," "PORN FILMS," OR "PORN STARS" AT TRIAL (CULT PHASE)

Any other Such Relief the Court Deems Fair AND JUST.

Respectfully Submitted, pro se,  


Date: September 24, 2023

Date E. Holloway Jr. #117151

NHSP-M P.O. Box 14 Concord, N.H. 03301

**NEW HAMPSHIRE STATE POLICE  
CONTINUATION OF INVESTIGATION REPORT**

1. CASE NO. MC19-16053	2. INVESTIGATING TROOPER Christopher Martineau	3. I.D. NO. 1221	4. TOWN OF CRIME Pelham	5. TN. CD. XXXXXX	6. DATE OF REPORT 10/12/2019
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Prior to this interview, WOODBURY had left a voicemail stating she wanted to talk with someone about the Pelham shooting and HALLOWAY. Her concern was for the explicit photos that could be on HALLOWAY's phone. Copies of this voicemail were copied to CD-R compact disks and provided to the lead investigator.

Furthermore, WOODBURY sent a screenshot of her text message conversation with HALLOWAY. The images were copied to CD-R compact disks and provided to the lead investigator.

The interview was conducted by phone and within the New Hampshire State Police – Major Crime Unit Conference room located at 33 Hazen Drive in Concord, New Hampshire.

The following information was made from a review of the interview.

- WOODBURY stated she met HALLOWAY on two different apps. WOODBURY identified the apps as "Plenty of Fish" and "Tagged."
- She stated she met him a couple of times face to face and one of the times she rented a hotel room in Merrimack.
- WOODBURY said HALLOWAY told her his name was "DJ" (Delvin Jr.).
- WOODBURY said HALLOWAY had two cell phones. A black Android and a white I-Phone. She said she only had one number, identifying it was [REDACTED]
- WOODBURY said when she went to pick him up, HALLOWAY told her to park in front of 554 Lake Avenue in Manchester. She identified 549 Lake Avenue as the place HALLOWAY was living.
- WOODBURY said she picked him up and they drove around. She added she took him to a stadium where he once worked as he thought he had a paycheck there.
- WOODBURY said HALLOWAY told her he makes money by doing/recording pornography of women in his "Trap house."
- WOODBURY said HALLOWAY told her he has two "Trap Houses," one in Boston the other in Manchester.

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- In asking WOODBURY what a “Trap House” means. She said it is a drug house where they sell out of, a profit house, where they do illegal activity.
- WOODBURY also stated HALLOWAY mentioned that the “Trap Houses” is where he sells out of, does pornography of women, and sells heroine.
- WOODBURY stated they ended up in a parking lot at the Elliot Hospital where HALLOWAY took a picture of WOODBURY as she “flashed” him.
- WOODBURY said she rented the hotel room at the Holiday extended stay in Merrimack on Thursday, October 10, 2019.
- WOODBURY stated while at the hotel, HALLOWAY took a bath and while he was in the bath, he was doing a pod cast on the white I-Phone. She said during the podcast she heard him say Y’all can’t do it like me. She added that she thought he had videotaped them messing around and posted it online.
- When she asked him, HALLOWAY said he did not and that he was just doing his pod cast like he normally does.
- HALLOWAY told WOODBURY about the preacher who was shot in Londonderry. WOODBURY said HALLOWAY identified him as his grandfather; however, she later discovered it was his step-father.
- WOODBURY also said HALLOWAY told her about the other kid. Saying, “The other kid was, I guess he was synthesized in drugs because he started to talk about it and then I cut him off and that’s when he mentioned he said push some butane through something and then he mentioned heroine and then that when he said about his trap houses and then I cut him off cuz I didn’t want to know.”
- In asking WOODBURY what HALLOWAY said about the shooting with his grandfather, WOODBURY said the following:
  - HALLOWAY told her his grandfather knew the boy.
  - That he went over to speak with him and that there was an altercation and the kid shot him.
  - She added HALLOWAY did not go too much into it and he was very hesitant about saying a lot.
  - Early in the interview, WOODBURY said HALLOWAY told her the preacher was trying to divert the person who had shot him because the man was running a drug operation.

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- WOODBURY said after the hotel, she drove HALLOWAY back to Manchester. She said he kept saying he had no one there to watch his house so he had to go there and sit.
- WOODBURY said HALLOWAY had his family coming up and they were going to be making food for the funeral. She added when she texted him on Friday, October 11, 2019, asking him how things were going. He said things were getting hectic at his house.
- WOODBURY said she thinks HALLOWAY planned it out. In asking her what makes her say that, she said:
  - From the conversation in the hotel room HALLOWAY did not say it was his step-father, he referred to the bishop that got shot in Londonderry as his grandfather. He then said his family was coming up, that they were all going to get together and make final respects and they were going to be in the same church. Then he goes and he shoots the couple and shoots the preacher that's doing their wedding in the same church.
  - WOODBURY said "The way that it leads up to it, it kinda looks like he had it planned." "His demeanor and the way that it happened that's what it looks like."
  - In asking her what she means by his demeanor, WOODBURY said "When he would go into the fact about his dad getting shot and everything, he would go into deep thought and he would pause but he wouldn't say anything about it and then he just said he had something to do Saturday." This conversation took place within the hotel room on Thursday, October 10, 2019.

The full interview has been copied to CD-R compact disks. Copies of these discs were supplied to the lead investigator.

END OF REPORT

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