

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.

Response AND OBJECTION to State's Motion in Limine  
to Exclude Evidence of Defendant's Pornography AND  
MUSIC "ENDEAVORS" in Guilt Phase of Trial

In response, the Defendant, Dale E. Holloway Jr., pro se,  
objects to State's Motion in Limine to Exclude Evidence  
of Defendant's pornography AND MUSIC "ENDEAVORS"  
in Guilt phase of Trial for the following reasons:

1. The State prosecutes the Defendant, Dale E. Holloway Jr., pro se, while He is indigent, incarcerated, and put out of the Equal protection of the law. Mr. Holloway is charged with (2) Two Attempted Murder offenses, and other serious assault crimes, including convicted felon in possession of a firearm.

2. Mr. Holloway contends that the State may allow its witnesses to testify to pornography and/or music lyrics of his own personal recording, in which will be rebutted if introduced ~~as~~ any bad prior act, to expose the falsity, or to oppose the contradicting testimony of said witnesses.
3. Therefore, should the State agree to exclude any testimony of pornography and/or music lyrics of Mr. Holloway's own personal recordings, then there will be no issue of Guilt Phase of the bifurcated trial, under NH R. Evi. Rules (Subpart I-II)

Wherefore, the Defendant respectfully objects in response to State's Motion in Limine to Exclude Evidence of Defendant's pornography and Musical "Endeavors" in Guilt Phase; and/or requests that this Honorable Court:

- A.) Schedules an Evidentiary Hearing for the matter to be fully heard, pursuant to NH R. Evi. Rule 104 and 401; and/or

B.) Accepts this response and objection to State's Motion in Limine to Exclude Evidence of Defendant's pornography and musical "Endeavors" in Guilt phase of Trial; or

C.) Denies the State's Motion in Limine to Exclude Evidence of Defendant's pornography and musical "Endeavors" in Guilt phase of Trial, pursuant to NH R. Evi., Rule 104(e).

any other such relief the Court deems fair and just.

Respectfully Submitted, pro se,  


Dale E. Holloway Jr. #117157

NHSP - M

P.O. Box 14

CONCORD, NH 03301

Date: September 28, 2023