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RETIRED
GEORGE R. ST. JOHN

February 3, 2012

BY HAND DELIVERY

Liezelle A. Dugger, Clerk
Charlottesville Circuit Court
315 E. High Street
Charlottesville, Virginia 22902

Re: Commonwealth v. George W. Huguely, V

Dear Ms. Dugger:

Enclosed for filing please find Defendant's Motion for Order as to Comment by Counsel and Law Enforcement in Proceedings and Defendant's Motion *in Limine* as to Certain Photographs.

Thank you.

Very truly yours,

Francis McQ. Lawrence

FML/aes
Enclosure

Cc: W. Davies Chapman, Esquire (By Hand Delivery w/ Enclosures)
Rhonda Quagliana, Esquire

VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF
CHARLOTTESVILLE

COMMONWEALTH OF VIRGINIA,

v.

Case No. 11-102

GEORGE HUGUELY,
Defendant.

**DEFENDANT'S MOTION FOR ORDER AS TO COMMENT BY
COUNSEL AND LAW ENFORCEMENT IN PROCEEDINGS**

Defendant, George W. Huguely, V, ("Mr. Huguely"), by counsel,
respectfully moves the Court to order that the Commonwealth and the defendant,
and all persons involved in the case in their offices and all employees of the City
of Charlottesville Police Department, be ordered and directed to make no public
comment on the proceedings in Commonwealth v. George W. Huguely, V, until
the proceeding shall have ended and/or the jury is discharged, whichever shall
occur last.

GEORGE HUGUELY

By Counsel

FILED

2012 FEB -3 A 9 07

CIRCUIT COURT CLERK'S OFFICE
CHARLOTTE, VIRGINIA
LLEZELLE A. GLENN, CLERK
BY *[Signature]*

ST. JOHN, BOWLING, LAWRENCE & QUAGLIANA, LLP

By: _____

Francis McQ. Lawrence
 VSB# 14754
 Rhonda Quagliana
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 416 Park Street
 Charlottesville, Virginia 22902
 434-296-7138 telephone
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 rq@stlawva.com
 Counsel for George W. Huguey, V

CERTIFICATE

I hereby certify that a true and exact copy of the foregoing was sent by hand delivery this 3rd day of February 2012 to:

Warner D. Chapman
 Charlottesville Commonwealth
 Attorney's Office
 P. O. Box 911
 Charlottesville, Virginia 22902

 Francis McQ. Lawrence
 Rhonda Quagliana

VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF CHARLOTTESVILLE

COMMONWEALTH OF VIRGINIA,

v.

Case No. 11-102

GEORGE HUGUELY,
Defendant.

DEFENDANT'S MOTION IN LIMINE AS TO CERTAIN PHOTOGRAPHS

Defendant, George W. Huguely, V, ("Mr. Huguely"), by counsel, respectfully moves that the Court exclude from evidence in this case the following proposed photographic exhibits from the Commonwealth upon the basis that the same are more prejudicial than probative:

Defendant will state with respect to each photo the basis for his objection.

1. Photograph number 5 shows Yeardeley Love ("Ms. Love") in a position to which she was moved by the emergency medical technicians. The fact of her medical treatment; the effect of any such treatment on the scene; and the possible effect of any such treatment on her condition are all addressed in other photographs which are less graphic and less inflammatory.

2. Photographs number 67 and 68 show Ms. Love in a prejudicial fashion; the point of depiction for photographs 67 and 68 can be shown by photographs 69 and 70 without prejudice.

3. Photograph number 73 unnecessarily shows a portion of the decedent's leg. The purpose for the picture, to show blood on the leg, can be shown without showing a portion of the decedent's body.

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CHARLOTTESVILLE, VA
MEZELL A. HIGHER, CLERK
BY *[Signature]*
DEPUTY CLERK

4. Photographs number 74 and 75 show the body of the decedent with her hands and feet bagged. The bagging of Ms. Love's hands and legs is shown in other pictures which are less prejudicial and inflammatory.

5. Photograph number 79 is objected to on the basis that it shows more of the body of Ms. Love than is necessary to depict and is accordingly prejudicial.

6. Photograph number 113 unnecessarily has Ms. Love's foot in the picture.

7. Photographs 229 and 230 are unnecessarily inflammatory and graphic pictures of the dissected neck, and what is sought to be shown by the dissection can be shown in photographs of the neck without dissection.

8. Photographs 239 and 240; 241, 242, and 243 are all autopsy dissections of the head and brain and depict items which are otherwise depicted in photographs without dissection and are unnecessarily inflammatory.

9. Exhibits to be appended to the report of Dr. Fuller. These dissected brain views seem inflammatory and unnecessary for the illustration by the Doctor of her findings.

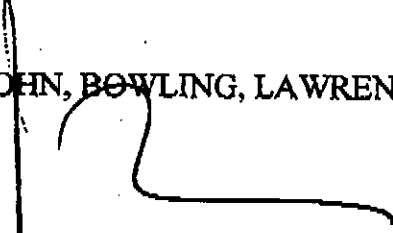
WHEREFORE, for the reasons set forth above, defendant, George W. Huguely, V, respectfully requests that the Court grant his Motion *in Limine* and exclude the photographs identified above, or such of them that the Court deems are inappropriately inflammatory and not sufficiently probative or necessary.

GEORGE HUGUELY

By Counsel

ST. JOHN, BOWLING, LAWRENCE & QUAGLIANA, LLP

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