

IN THE CIRCUIT COURT OF THE FOURTEEN JUDICIAL CIRCUIT  
OF THE STATE OF FLORIDA IN AND FOR BAY COUNTY  
CRIMINAL JUSTICE DIVISION

STATE OF FLORIDA

CASE NO.: 06-4016CF

v.

HENRY DICKENS  
CHARLES ENFINGER

[REDACTED]  
RAYMOND HAUCK

[REDACTED]  
KRISTIN SCHMIDT  
JOSEPH WALSH II

06-4016CF MA  
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FILED

STATE'S THIRD MOTION FOR ORDER IN LIMINE

THE STATE OF FLORIDA, moves this Court for an Order in Limine instructing the Attorneys for the Defendant(s) to refrain from making any direct or indirect mention whatsoever at trial before the jury of the matter(s) hereinafter set forth, without first obtaining permission from the Court outside the presence and hearing of the jury, on the grounds that said matter(s) is incompetent, irrelevant or immaterial to the issues involved herein, and will serve only to unfairly prejudice the jurors against the State thereby requiring a mistrial, pursuant to the authority of Henry v. State, 290 So.2d 73 (2d DCA 1974).

- ✓ 1. Any bad character evidence concerning Robert Anderson.
- ? 2. Any hearsay statements made by Robert Anderson.
- ? 3. Any arrest or criminal history of Robert Anderson to include the underlying facts or the nature of the charges.
- ✓ 4. Any inquiry into any child support actions taken against Mr. Anderson.
- ? 5. Any inquiry into whether Mr. Anderson was advised by any medical personal at the time of Martin Anderson's birth that

Martin Anderson had sickle cell trait.

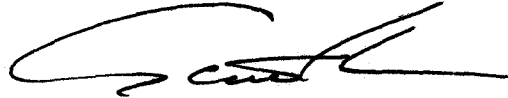
- ✓ 6. Any change in Mr. Anderson's financial status or employment status since Martin Anderson's death or pursuant to any civil settlement.
- ? 7. The nature and extent of Robert Anderson's relationship with Martin Anderson.
- ✓ 8. The nature and extent of any involvement Robert Anderson had in the discipline and punishment of Martin Anderson and the type of punishment used.
- ✓ 9. Any meetings between Robert Anderson and then Governor Bush and Robert Anderson and Governor Crist and any conversations Mr. Anderson had with either Governor.

I HEREBY CERTIFY that a copy of the foregoing Motion for Order in Limine has been furnished to Hoot Crawford, attorney for Henry Dickens, at 748 Jenks Avenue, P.O. Box 1103, Panama City, Florida 32402; Walter B. Smith, Deputy Public Defender, attorney for Charles Enfinger, at 115 East 4<sup>th</sup> Street, P.O. Box 580, Panama City, Florida 32402-0580; Robert Sombathy, attorney for

[REDACTED] at P.O. Box 430, Panama City, Florida 32402; James H. White, Jr., attorney for Raymond Hauck, at 229 McKenzie Avenue, Panama City, Florida 32401; [REDACTED] 327, Panama City, Florida 32402-0327; Jonathan Dingus, attorney for [REDACTED] [REDACTED] at 527 Jenks Avenue, Panama City, Florida 32401; Ashley Benedik, attorney for Kristin Schmidt, at 1004 Jenks Avenue, Panama City, Florida 32401; and Robert Pell, attorney for Joseph Walsh II, at 514 Magnolia Avenue, P.O. Box 651, Panama City, Florida 32401, via U.S. mail and facsimile, on this 21 day of August, 2007.

Respectfully submitted,

MARK A. OBER  
STATE ATTORNEY



SCOTT HARMON  
ASSISTANT STATE ATTORNEY  
FLORIDA BAR #933775

SH/rje