

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

Lorrie Henderson v. Manoj Parbatsingh Ghayalod

Henderson v. Ghayalod · No. Civil No. 24-1442(RAM) · Decided April 16, 2026

SUMMARY

The United States District Court for the District of Puerto Rico partially grants and partially denies Plaintiff Lorrie Henderson’s motion in limine in a Puerto Rico tort action arising from alleged domestic abuse. The court excludes evidence of Plaintiff’s prior drug use and specific prior domestic abuse and restraining orders, while allowing evidence of alcohol consumption and prior mental health treatment for limited purposes. The court denies without prejudice the request to exclude questions about schizophrenia and hallucinations and denies the request to present evidence of Defendant’s financial condition for punitive damages.

CASE DETAILS

COURT	United States District Court for the District of Puerto Rico
WRITING FOR THE COURT	Raul M. Arias-Marxuach
JURISDICTION	United States District Court for the District of Puerto Rico
DECIDED	April 16, 2026
DOCKET	Civil No. 24-1442(RAM)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved in limine to exclude specified evidence and to admit evidence of Defendant's financial condition for punitive damages. The district court granted the motion in part and denied it in part.
STANDARD OF REVIEW	The court applied the Federal Rules of Evidence governing relevance, character evidence, and unfair prejudice in ruling on the motion in limine.
PRECEDENTIAL VALUE	district court opinion; precedential status not stated
PARTIES	Lorrie Henderson v. Manoj Parbatsingh Ghayalod

TOPICS

- motion in limine
- evidence
- character evidence
- damages
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether evidence of Plaintiff's prior drug use should be excluded under Rules 404(b) and 403.
2. Whether evidence of Plaintiff's alcohol consumption should be excluded as irrelevant or otherwise inadmissible.
3. Whether evidence of Plaintiff's prior mental-health treatment was relevant to causation, damages, symptoms, or credibility.
4. Whether evidence concerning the specific domestic abuse and restraining order from Plaintiff's first marriage should be excluded because its probative value was substantially outweighed by unfair prejudice.
5. Whether questions concerning schizophrenia and hallucinations should be excluded before trial.
6. Whether Plaintiff could present evidence of Defendant's financial condition in support of her punitive-damages claim despite Puerto Rico's statutory punitive-damages cap.

HOLDINGS

1. Prior drug use may not be used to attack Plaintiff's general credibility, and Defendant failed to establish a special relevance for the evidence independent of character or propensity. Because Defendant did not show that Plaintiff used drugs when the alleged incidents occurred or provide evidence linking the drug use to her claimed symptoms and damages, testimony about the prior drug use was excluded.
2. The request to exclude testimony about Plaintiff's alcohol consumption was denied because Defendant asserted a genuine factual controversy concerning whether Plaintiff consumed alcohol on the day of the incident, making the evidence potentially relevant for permissible purposes.
3. Evidence of Plaintiff's prior mental-health treatment was admissible for purposes of evaluating preexisting conditions, alternative causes of emotional distress, symptom severity, causation, and damages, but it could not be used to generally attack Plaintiff's credibility.
4. The specific nature of the domestic abuse Plaintiff experienced in her first marriage and the restraining order obtained against her first ex-husband were excluded because any probative value was substantially outweighed by unfair prejudice. Defendant could inquire about the prior mental-health treatment and symptoms arising from the prior marriage, but not the specific abuse or restraining-order evidence.
5. The request to exclude questions about whether Plaintiff was schizophrenic or suffered from hallucinations was denied without prejudice because the request was premature and overbroad; any evidentiary issue could be addressed through a contemporaneous objection.
6. Plaintiff could not present evidence of Defendant's financial condition for punitive-damages purposes because Article 1538 of the Puerto Rico Civil Code caps punitive damages at the amount of compensatory damages, and the court's statutory interpretation superseded the earlier decision in *Acevedo-Luis* to the extent of any conflict.

KEY QUOTATIONS

“The admissibility of Rule 404(b) evidence is considered in two steps: “first, a court must determine whether the evidence in question has any special relevance exclusive of [the witness’s] character or propensity; and second, notwithstanding its special relevance, whether the evidence meets the standard set forth in Fed.R.Evid. 403.”” (Section II)

“Nevertheless, “even ‘concededly relevant evidence’ should be excluded if it would otherwise ‘lure the factfinder into declaring guilt on a ground different from proof specific to the offense charged.’”” (Section II)

FACTUAL BACKGROUND

Plaintiff brought Puerto Rico tort claims arising from alleged domestic abuse on April 3, 2024, seeking more than \$6 million in emotional and compensatory damages and punitive damages. The disputed evidence concerned Plaintiff’s prior drug use, alcohol consumption, mental-health treatment, prior abusive relationship and restraining order, questions about schizophrenia and hallucinations, and Defendant’s financial condition. The court evaluated whether the evidence was relevant, had a permissible non-propensity purpose, and was subject to exclusion based on unfair prejudice or lack of probative value.

PROCEDURAL HISTORY

Plaintiff filed Puerto Rico tort claims arising from alleged domestic abuse, later filing an amended complaint seeking emotional, compensatory, and punitive damages. Plaintiff moved in limine, and Defendant opposed the motion. The court ruled on each evidentiary request and entered an order granting the motion in part and denying it in part.

DISPOSITION

other

CASES CITED

- *Amarin Plastics, Inc. v. Maryland Cup Corp.*, 946 F.2d 147, 150 (1st Cir. 1991)
- *United States v. Landrau-Lopez*, 444 F.3d 19, 23 (1st Cir. 2006)
- *United States v. Villa-Guillen*, 102 F.4th 508, 518 (1st Cir. 2024)
- *United States v. Morales-Aldahondo*, 524 F.3d 115, 119-20 (1st Cir. 2008)
- *United States v. García-Sierra*, 994 F.3d 17, 33 (1st Cir. 2021)
- *Jarret v. United States*, 822 F.2d 1438 (7th Cir. 1987)
- *United States v. Perez-Greaux*, 83 F.4th 1, 29 (1st Cir. 2023)
- *United States v. Diaz-Colon*, 651 F. Supp. 3d 468, 481 (D.P.R. 2023), *aff’d*, 163 F.4th 1 (1st Cir. 2025)
- *Ritch v. A M Gen. Corp.*, No. CIV. 93-451-SD, 1997 WL 834214, at *4 (D.N.H. Nov. 17, 1997)
- *Gazlay v. Buck Rub Pub, Lodge & Realty, LLC*, No. 22-CV-138-AJ, 2024 WL 7010497, at *1, *5 (D.N.H. Feb. 22, 2024)
- *Lund v. Henderson*, 807 F.3d 6, 12 (1st Cir. 2015)
- *Morris v. Long*, No. 1:08-CV-01422-AWI, 2012 WL 1498889, at *4 (E.D. Cal. Apr. 27, 2012)

- *Acevedo-Luis v. Pagan*, 478 F.3d 35, 39 (1st Cir. 2007)

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