

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)

OPINION

Ghayalod

PER CURIAM.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF PUERTO RICO

LORRIE HENDERSON,

Plaintiff,

CIVIL NO. 24-1442(RAM)

v.

MANOJ PARBATSINGH GHAYALOD,

Defendant.

OPINION AND ORDER

RAUL M. ARIAS-MARXUACH, United States District Judge. Pending before the Court is Plaintiff Lorrie Henderson's Motion in Limine (the "Motion"). (Docket No. 51). After reviewing the parties' submissions in support and opposition, the Motion is hereby GRANTED IN PART and DENIED IN PART.

I. FACTUAL AND PROCEDURAL BACKGROUND

On September 20, 2024, Plaintiff Lorrie Henderson ("Plaintiff" or "Ms. Henderson") filed a Complaint asserting tort claims under Puerto Rico law against Defendant Manoj Parbatsingh Ghayalod ("Defendant" or "Mr. Ghayalod") arising from domestic abuse that allegedly occurred on April 3, 2024. (Docket No. 1). On January 10, 2025 Plaintiff filed an Amended Complaint. (Docket No. 23). Therein, Plaintiff seeks emotional and compensatory damages in excess of \$6,000,000 as well as punitive damages, both under Puerto Rico's Civil Code. *Id.* at 8. Plaintiff filed a Motion in limine on January 19, 2026, requesting both exclusionary and inclusionary relief. (Docket No. 51). Specifically, Plaintiff asks that testimony regarding the following subject matters be excluded: Plaintiff's prior drug use; Plaintiff's alcohol consumption; Plaintiff's prior mental health treatment; and Plaintiff's prior abusive relationship as well as the restraining order obtained against her first ex-husband. *Id.* Plaintiff also requests that questions regarding her being schizophrenic or suffering from hallucinations be excluded. Additionally, Plaintiff asks that evidence as to Defendant's financial condition be included for punitive damages purposes. *Id.* On February 10, 2026, Defendant filed an Opposition. (Docket No. 64).

II. APPLICABLE LAW

"To be admissible at trial, evidence must be relevant, tending to prove a "fact that is of consequence to the determination of the action.'" *Amarin Plastics, Inc. v. Maryland Cup Corp.*, 946 F.2d 147, 150 (1st Cir. 1991) (citing Fed. R. Evid. 401, 402). Fed. R. Evid. 404(b)(1) establishes prohibited uses of character or propensity evidence, stating that "evidence of any other

crime, wrong, or act is not admissible to prove a person's character in order to show that on a particular occasion the person acted in accordance with the character." Conversely, Fed. R. Evidence 404(b)(2) provides "[t]his evidence may be admissible for another purpose, such as proving motive, opportunity, intent, preparation, plan, knowledge, identity, absence of mistake, or lack of accident." Even if admissible, pursuant to Fed. R. Evid. 403, "the court may exclude relevant evidence if its probative value is substantially outweighed by a danger of one or more of the following: unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence." Accordingly, "[t]he 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'] character or propensity; and second, notwithstanding its special relevance, whether the evidence meets the standard set forth in Fed.R.Evid. 403.'" *United States v. Landrau-Lopez*, 444 F.3d 19, 23 (1st Cir. 2006). When evaluating whether evidence should be stricken under Fed. R. Evid. 403, the First Circuit has cautioned that because all evidence is meant to be prejudicial by design, "a district court's rulings under Rule 403 must avoid only 'unfair' prejudice." *United States v. Villa-Guillen*, 102 F.4th 508, 518 (1st Cir. 2024) (quoting *United States v. Morales-Aldahondo*, 524 F.3d 115, 119-20 (1st Cir. 2008)). 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.'" *Id.* quoting (*United States v. García-Sierra*, 994 F.3d 17, 33 (1st Cir. 2021)).

III. DISCUSSION

A. Testimony regarding prior drug use Plaintiff seeks to exclude her deposition testimony discussing how she had tried cocaine, THC, and marijuana at some point after 2012. (Docket No. 51 at 2-4). Ms. Henderson argues that evidence regarding a witness' drug use "is only relevant as to the ability of the witness to perceive the underlying events and testify lucidly at trial." *Id.* (quoting *Jarret v. United States*, 822 F.2d 1438 (7th Cir. 1987)). Per Plaintiff, there is no evidence of her drug use on the day of the events alleged in the Amended Complaint. *Id.* Lastly, even if admissible, she contends evidence regarding drug use should be excluded because it can prompt improper bias for the jury pursuant to Fed. R. Evid. 403. Defendant counters that exclusion is improper given that he does not seek to use the testimony as impermissible character or propensity evidence, but rather for limited proper purposes, such as: credibility and perception, Plaintiff's memory, Plaintiff's interpretation of Defendant's conduct, relationship context, and damages and causation. (Docket No. 64 at 2-3). Defendant maintains that these are permitted uses of evidence pursuant to Fed. R. Evid. 404(b)(2). *Id.* The parties agree that evidence regarding Plaintiff's prior drug use constitutes evidence that generally is "not admissible to prove a person's character in order to show that on a particular occasion the person acted in accordance with the character." *United States v. Perez-Greaux*, 83 F.4th 1, 29 (1st Cir. 2023) (citing Fed. R. Evid. 404(b)). The question before the Court is whether this evidence may properly be used for other purposes. Defendant has not established that this evidence has a "special relevance" exclusive of Plaintiff's

character or propensity. Courts have held that “a history of drug use lacks probative value of showing a propensity to lie on the stand.” *United States v. Diaz-Colon*, 651 F. Supp. 3d 468, 481 (D.P.R. 2023), *aff’d*, 163 F.4th 1 (1st Cir. 2025) (quotations omitted) (cleaned up). Therefore, evidence of prior drug use cannot be used to question Plaintiff’s credibility in general. Defendant asserts that because Plaintiff admitted to using drugs during their six-month relationship, this evidence is relevant to question Plaintiff’s recollection of the events. (Docket No. 64 at 3). However, Defendant does not allege that Plaintiff was using drugs when the incidents that gave rise to the Amended Complaint occurred. See *Ritch v. A M Gen. Corp.*, No. CIV. 93-451-SD, 1997 WL 834214, at *4 (D.N.H. Nov. 17, 1997). Furthermore, Defendant does not proffer any evidence, let alone expert testimony, to establish a link between Plaintiff’s drug use and the symptoms for which she currently seeks to recover damages. See *Gazlay v. Buck Rub Pub, Lodge & Realty, LLC*, No. 22-CV-138-AJ, 2024 WL 7010497, at *1 (D.N.H. Feb. 22, 2024). Accordingly, in the absence of such a proffer, Plaintiff’s request to exclude testimony regarding prior drug use is GRANTED.

B. Testimony regarding Plaintiff’s alcohol consumption Plaintiff requests the exclusion of her deposition testimony admitting that she drank beer with Defendant and considers herself a “drinker,” arguing that it is irrelevant and inadmissible as it lacks probative value per Fed. R. Evid. 401. (Docket No. 51 at 4- 5). She further asserts that no evidence shows that Plaintiff had an alcoholic drink on the date of the events alleged in the Amended Complaint nor that the events were caused by her alcohol consumption. *Id.* Defendant contends testimony regarding alcohol consumption will only be used for permissible purposes, not character evidence. (Docket No. 64 at 3-4). Moreover, he claims there is a genuine controversy of fact as to whether Plaintiff was consuming alcohol on the day of the incident and thus, he should be entitled to question her about her drinking. *Id.* at 4. Accordingly, Plaintiff’s request to exclude testimony regarding her alcohol consumption is DENIED.

C. Testimony regarding prior mental health treatment Plaintiff asks that the Court exclude her testimony that she has previously participated in behavioral counseling due a rough patch with her previous husband and received mental health medication prior to 2010. (Docket No. 51 at 5-6). Ms. Henderson posits that this medical treatment lacks temporal proximity to the events of the Complaint, lacks probative value, and could lead to undue prejudice if provided to the jury. *Id.* Defendant argues that Plaintiff’s prior treatment is relevant to Plaintiff’s preexisting conditions; alternative causes of emotional distress; severity of symptoms; and credibility and perception. (Docket No. 64 at 4). Defendant correctly notes, albeit without providing supporting citations as required by Local Rule 7(a), that courts routinely permit evidence of prior mental health treatment in cases where emotional distress damages are claimed. See *Lund v. Henderson*, 807 F.3d 6, 12 (1st Cir. 2015) (noting that plaintiff’s “prior psychiatric condition was directly relevant to their claimed [emotional] damages,” and thus was correctly admitted even if his pre-existing mental illness and behavior led jurors to question his credibility); *Morris v. Long*, No. 1:08-CV-01422-AWI, 2012 WL 1498889, at *4 (E.D. Cal. Apr. 27, 2012) (“Plaintiff’s mental health and medical histories may contain evidence to controvert the claim that

Plaintiff's physical and emotional injuries were caused by Defendant."); Gazlay, No. 22-CV-138-AJ, 2024 WL 7010497, at *5. In light of the above, evidence regarding Plaintiff's prior mental health treatment is relevant to issues of damage and causation and is thus admissible for said purposes. However, this evidence should not be used to generally challenge Plaintiff's credibility. Plaintiff's blanket request to exclude testimony regarding her prior mental health treatment is DENIED. D. Testimony regarding Plaintiff's prior abusive relationship Plaintiff seeks the exclusion of her testimony regarding domestic abuse that occurred during her first marriage over a decade ago and the fact that she obtained a restraining order against her first ex-husband. (Docket No. 51 at 6—7). Plaintiff asserts that this testimony is irrelevant and highly prejudicial. Id. Defendant maintains that Ms. Henderson's prior psychological suffering in the context of a previous marriage is relevant to determining damages and is relevant as to credibility. (Docket No. 64 at 5-6). Even if evidence of prior domestic abuse holds some probative value, said value would be substantially outweighed by unfair prejudice to Plaintiff. See e.g., Gazlay, No. 22-CV-138-AJ, 2024 WL 7010497, at *5 (D.N.H. Feb. 22, 2024) (excluding references to plaintiff's sexual assault but allowing "references to the fact that he experienced an unspecified trauma which resulted in his PTSD diagnosis, as well as any related symptoms[.]"). As noted above, Defendant can inquire about Plaintiff's previous mental health treatment and symptoms arising from difficulties in her previous marriage. However, Defendant may not elicit testimony regarding the specific nature of the domestic abuse Plaintiff faced in her first marriage. Plaintiff's request to exclude testimony regarding her previous incidents of domestic abuse and restraining orders is GRANTED. E. Questions regarding schizophrenia and hallucinations Plaintiff notes that at her deposition, she denied being schizophrenic or suffering from hallucinations, and contends that the record lacks evidence to justify asking these questions at trial. (Docket No. 51) at 8). Defendant argues that this request is premature and overbroad and asserts that the proper remedy is a contemporaneous objection. The Court agrees with Defendant and concludes that exclusion is not proper at this juncture. Therefore, Plaintiff's request to exclude questions regarding schizophrenia and hallucinations is DENIED WITHOUT PREJUDICE. F. Evidence regarding Defendant's financial condition Lastly, Plaintiff asks that the Court allow her to present evidence regarding Defendant's finances at trial. She points to *Acevedo-Luis v. Pagan*, whereby the First Circuit held that the trial court "committed no error in instructing the jurors that they could consider [defendant's] financial resources, in her personal capacity, in fixing the amount of punitive damages." 478 F.3d 35, 39 (1st Cir. 2007). However, as the Court previously held in its order at Docket No. 46, Article 1538 of the Puerto Rico Civil Code caps punitive damages, providing that they shall not be greater than the amount of damage caused (i.e., not greater than compensatory damages awarded). P.R. Laws. Ann. Tit. 31 § 10803. *Acevedo-Luis* predates Article 1538 of the Puerto Rico Civil Code and cannot contravene the clear text of the statute. Accordingly, Plaintiff's request to present evidence regarding Defendant's finances is hereby DENIED.

IV. CONCLUSION

In accordance with the above, Plaintiff's Motion in Limine at Docket No. 51 is GRANTED IN PART and DENIED IN PART. Plaintiff's requests to exclude testimony regarding alcohol consumption and prior mental health treatment, as well as questioning regarding schizophrenia and hallucinations, are DENIED. Plaintiff's requests to exclude testimony regarding prior drug use and previous incidents of domestic abuse and a restraining order in her first marriage are GRANTED. Furthermore, Plaintiff's request to include evidence regarding Defendant's financial condition is DENIED. IT IS SO ORDERED. In San Juan, Puerto Rico this 16th day of April 2026.

S/ RAÚL M. ARIAS-MARXUACH
United States District Judge