

SUPREME COURT OF RHODE ISLAND

William Lamont Thomas v. Omar Proctor et al.

63 A.3d 881 (R.I. 2013) · No. 2011-309-Appeal (PC 05-6410) · Decided April 17, 2013

SUMMARY

The Rhode Island Supreme Court affirmed a Superior Court judgment entered after a jury found for a Providence police officer in a civil action arising from the officer’s shooting of William Lamont Thomas. The Court held that the trial justice did not abuse his discretion under Rhode Island Rule of Evidence 403 by admitting a redacted police database report containing Thomas’s mug shot and reference to a prior arrest for possession of a shotgun.

CASE DETAILS

COURT	Supreme Court of Rhode Island
WRITING FOR THE COURT	Chief Justice Paul A. Suttell; Chief Justice Suttell; Justice Goldberg; Justice Flaherty; Justice Robinson; Justice Indeglia
JURISDICTION	Rhode Island
DECIDED	April 17, 2013
DOCKET	2011-309-Appeal (PC 05-6410)
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff appealed from a Superior Court judgment entered after a jury verdict for the defendant in a civil action seeking damages for injuries sustained when a police officer shot the plaintiff. The appeal challenged admission of a redacted police department database report and denial of the plaintiff's motion for a new trial.
STANDARD OF REVIEW	The Supreme Court reviews a trial justice's evidentiary ruling for abuse of discretion that prejudices the complaining party. A trial justice's discretion to exclude evidence under Rhode Island Rule of Evidence 403 must be used sparingly; exclusion is required only when evidence is marginally relevant and enormously prejudicial.
PRECEDENTIAL VALUE	Published Rhode Island Supreme Court opinion; precedential.
PARTIES	William Lamont Thomas v. Omar Proctor et al.

TOPICS

evidence

relevance

appellate procedure

standard of review

civil rights

PRACTICE AREAS

Evidence

Torts

Civil rights

Appellate procedure

QUESTIONS PRESENTED

1. Whether the trial justice abused his discretion under Rhode Island Rule of Evidence 403 by admitting a redacted police department database report containing Thomas's mug shot and a reference to a prior arrest for possession of a shotgun.
2. Whether the admission of the redacted report unfairly prejudiced Thomas so as to require a new trial.

HOLDINGS

1. The trial justice did not abuse his discretion by admitting the redacted report because the report was relevant to what Proctor knew at the time of the shooting and its probative value was not substantially outweighed by the danger of unfair prejudice.
2. Admission of the redacted report did not warrant a new trial, and the Superior Court properly denied Thomas's motion for a new trial.

KEY QUOTATIONS

"It is only when evidence is marginally relevant and enormously prejudicial that a trial justice must exclude it." (-4)

"For the reasons set forth in this opinion, we hold that the trial justice did not err in denying the plaintiff's motion for a new trial." (-10)

FACTUAL BACKGROUND

On December 20, 2004, Providence police officer Omar Proctor encountered William Lamont Thomas and attempted to arrest him based on an outstanding warrant. Proctor testified that Thomas appeared to fumble at his waistband, pushed Proctor, fled, and continued fumbling at his waistband, leading Proctor to believe Thomas was armed. Proctor fired one shot while pursuing Thomas and later fired a second shot that struck Thomas in the chest and arm. At trial, the central issue was whether Proctor acted reasonably under the circumstances and based on the information available to him at the time.

PROCEDURAL HISTORY

Thomas filed a civil complaint in Providence County Superior Court on December 16, 2005. After a jury trial commencing January 11, 2011, the jury found that Thomas had not proved by a fair preponderance of the evidence that Proctor acted unreasonably when he shot and injured Thomas. The Superior Court denied Thomas's motion for a new trial on March 7, 2011; judgment was entered June 26, 2012, and the Supreme Court treated Thomas's premature March 22, 2011 notice of appeal as timely. The Supreme Court affirmed and remanded the papers to the Superior Court.

DISPOSITION

affirmed

REMAND INSTRUCTIONS

The papers in the case were remanded to the Superior Court.

CASES CITED

- State v. Tetreault, 31 A.3d 777, 782 (R.I. 2011)
- State v. Dellay, 687 A.2d 435, 439 (R.I. 1996)
- State v. DeJesus, 947 A.2d 873, 883 (R.I. 2008)
- Chapdelaine v. State, 32 A.3d 937, 941 n.1 (R.I. 2011)
- State v. Dinagen, 639 A.2d 1353, 1356-58 (R.I. 1994)
- State v. Lemon, 456 A.2d 261, 265 (R.I. 1983)
- State v. Bowden, 439 A.2d 263, 269 (R.I. 1982)
- State v. Robertson, 740 A.2d 330, 336 (R.I. 1999)