

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
OKLAHOMA

Ashley D. Adams v. E-Z Mart Stores, Inc.

Adams · No. 23-CV-278-RAW · Decided March 18, 2026

SUMMARY

The United States District Court for the Eastern District of Oklahoma rules on Plaintiff Ashley D. Adams’s motion in limine seeking to exclude health records and evidence of alleged prior drug use. The court grants the motion as to physical and mental health evidence, and grants it in part and denies it in part as to alleged prior drug use, allowing the evidence only insofar as it may show that Mr. Adams had a history of methamphetamine use.

CASE DETAILS

COURT	United States District Court for the Eastern District of Oklahoma
WRITING FOR THE COURT	Ronald A. White
JURISDICTION	United States District Court for the Eastern District of Oklahoma
DECIDED	March 18, 2026
DOCKET	23-CV-278-RAW
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved in limine to exclude evidence concerning her health records, mental and physical health, and alleged prior drug use before trial.
STANDARD OF REVIEW	Evidentiary rulings on motions in limine are subject to the district court's sound discretion and may be changed as the case develops. Relevance is assessed under Federal Rule of Evidence 401.
PRECEDENTIAL VALUE	Unknown; district court order.

TOPICS

- motion in limine
- relevance
- evidence
- civil procedure

PRACTICE AREAS

- evidence
- civil procedure
- torts

QUESTIONS PRESENTED

1. Whether evidence concerning Plaintiff Ashley Adams's physical and mental health and related health records was relevant and admissible.
2. Whether evidence of Plaintiff's alleged prior drug use was relevant and admissible beyond the narrow issue of whether Mr. Adams had a history of methamphetamine use.

HOLDINGS

1. Plaintiff's physical and mental health were not at issue in the case, so the challenged health records and related evidence were excluded under Federal Rule of Evidence 401.
2. Evidence of Plaintiff's alleged prior drug use was admissible only insofar as it tended to prove that Mr. Adams had a history of methamphetamine use; it was not relevant for broader assertions concerning the effect of drugs on Plaintiff's memory.

KEY QUOTATIONS

“However, “the district court may change its ruling at any time for whatever reason it deems appropriate.””

“First with regard to Plaintiff, Ashley Adams mental and physical health, the court agrees that Ashley Adams’ physical and mental health are not at issue in this case, and the motion is GRANTED pursuant to Fed. R. Evid. 401.”

“Second Plaintiff, Ashley Adams’ alleged prior drug use is admissible but only relevant insofar as it tends to prove that Mr. Adams had a history of methamphetamine use.”

FACTUAL BACKGROUND

The case involves a wrongful death action in which Plaintiff sought to exclude references to her medical and mental health records and alleged prior drug use. The court determined that Plaintiff Ashley Adams's physical and mental health were not at issue. It also determined that the alleged prior drug use was relevant only to the narrow issue of whether Mr. Adams had a history of methamphetamine use, not to alleged effects on Plaintiff's memory absent supporting evidence of prior memory problems or contemporary drug use.

PROCEDURAL HISTORY

The United States District Court for the Eastern District of Oklahoma considered Plaintiff Ashley D. Adams's motion in limine in a wrongful death action. The court granted the motion as to evidence concerning Adams's physical and mental health, and granted it in part and denied it in part as to alleged prior drug use.

DISPOSITION

other

CASES CITED

- Mendelsohn v. Sprint/United Management Co., 587 F. Supp. 2d 1201, 1208 (D. Kan. 2008), aff'd, 402 F. App'x 337 (10th Cir. 2010)
- Jones v. Stotts, 59 F.3d 143, 146 (10th Cir. 1995)
- Luce, 469 U.S. at 41

OPINION

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF OKLAHOMA ASHLEY D. ADAMS Plaintiff, v. Case No. 23-CV-278-RAW E-Z MART STORES, INC., Defendant E-Z MART STORES, INC. Third Party Plaintiff v. LSC VENTURES, INC., D/B/A PROCORE FUEL SOLUTIONS Third-Party Defendant ORDER Before the court is the Plaintiff's Motion in Limine to Exclude Plaintiff's Health Records and Prior Alleged Drug Use [Dkt.

No. 95]. Plaintiff seeks to exclude evidence of Plaintiff, Ashley Adams, alleged prior drug use and any references to Plaintiff's medical and mental health records that does not "directly relate to her damages in a wrongful death action." Dkt. No. 95 at 1.

The Plaintiff has conferred with counsel for the Defendant in accordance with LCvR 7.1 (f), but the parties were unable to come to an agreement. Motions in limine are permitted under the Federal Rules of Evidence to allow the Court to decide evidentiary issues in advance of trial, avoid delay, ensure fairness, and narrow down the evidentiary issues. Mendelsohn v. Sprint/United Mgmt.

Co., 587 F. Supp. 2d 1201, 1208 (D. Kan. 2008), aff'd, 402 F. App'x 337 (10th Cir. 2010). However, "the district court may change its ruling at any time for whatever reason it deems appropriate." Jones v. Stotts, 59 F.3d 143, 146 (10th Cir. 1995) (citations omitted); see also Luce, 469 U.S. at 41 ("The ruling is subject to change when the case unfolds... [E]ven if nothing unexpected happens at trial, the district judge is free, in the exercise of sound judicial discretion, to alter a previous in limine ruling.") First with regard to Plaintiff, Ashley Adams mental and physical health, the court agrees that Ashley Adams' physical and mental health are not at issue in this case, and the motion is GRANTED pursuant to Fed.

R. Evid. 401. Second Plaintiff, Ashley Adams' alleged prior drug use is admissible but only relevant insofar as it tends to prove that Mr. Adams had a history of methamphetamine use. Beyond this narrow issue, the topic is not relevant. While the Defendant raises issues concerning the impact of drugs on memory, they fail to support the notion that Ms. Adams has had any prior issues concerning memory or that there is any contemporary drug use that might interfere with memory at trial.

Therefore, the Plaintiff's second request is GRANTED in part and DENIED in part. Therefore, Plaintiff's Motion in Limine to Exclude Plaintiff's Health Records and Prior Alleged Drug Use

[Dkt. No. 95] is hereby GRANTED in part and DENIED in part. IT IS SO ORDERED on this 18th day of March, 2026. _____ RONALD A. WHITE
UNITED STATES DISTRICT JUDGE

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