

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Kelley v. Reyes

No. 2:19-cv-17911-WJM-JSA (D.N.J. Jan. 7, 2026) · No. 2:19-cv-17911-WJM-JSA · Decided January 14, 2026

SUMMARY

The United States District Court for the District of New Jersey ruled on portions of the parties’ motions in limine before trial in Eric Kelley’s wrongful-conviction civil rights action. The court granted in part and denied in part Kelley’s Daubert motion, excluding the defense expert’s rebuttal testimony and limiting portions of his opening testimony. The court denied in part the City of Paterson’s motion concerning newspaper articles, while reserving judgment on hearsay within the articles and Rule 403 issues.

CASE DETAILS

COURT	United States District Court for the District of New Jersey
WRITING FOR THE COURT	William J. Martini
JURISDICTION	United States District Court for the District of New Jersey
DECIDED	January 14, 2026
DOCKET	2:19-cv-17911-WJM-JSA
DISPOSITION	other
PROCEDURAL POSTURE	Pretrial resolution of Plaintiff's motion in limine to exclude Defendants' expert and the City of Paterson's motion in limine to bar references to newspaper articles.
STANDARD OF REVIEW	For motions in limine, the trial court has wide latitude to control the admission of evidence and should exclude evidence before trial only when it is clearly inadmissible on all potential grounds. Under Rule 702 and Daubert, the proponent must establish admissibility by a preponderance of the evidence, and the court evaluates qualification, specialized knowledge, helpfulness, sufficient facts or data, reliable principles and methods, and reliable application.
PRECEDENTIAL VALUE	Unknown; district court opinion addressing pretrial evidentiary motions.
PARTIES	Eric Kelley v. Richard Reyes, City of Paterson, Albert Clark, Raymond Reid

TOPICS

daubert standard expert testimony hearsay authentication civil procedure

PRACTICE AREAS

Evidence Federal civil procedure Civil rights litigation Municipal liability

QUESTIONS PRESENTED

1. Whether Ronald Hampton's rebuttal and opening expert testimony satisfied Federal Rule of Evidence 702 and Daubert.
2. Whether Hampton's proposed testimony improperly invaded the jury's province, offered legal conclusions, assessed witness credibility, relied on speculation, or relied on later-created materials to address 1993 practices.
3. Whether the newspaper articles were inadmissible hearsay or insufficiently authenticated.
4. Whether remaining hearsay-within-hearsay and Rule 403 objections to the newspaper articles should be resolved before trial.

HOLDINGS

1. Hampton's proposed rebuttal testimony was inadmissible in full because it failed Daubert's fit requirement and Hampton was not qualified as a social psychologist to rebut Plaintiff's social-psychology expert. The testimony also improperly addressed witness knowledge, legal requirements, credibility, and factual narratives.
2. Hampton could testify, based on his training and experience, about how Paterson's police practices compared with other departments at the relevant time and how those practices evolved. He could not testify about irrelevant matters, fact-witness testimony, speculation, or 1993 policies based on materials created after 1993.
3. The Court denied Paterson's motion in limine insofar as it challenged the newspaper articles as hearsay because the articles were prepared before January 1, 1998 and therefore fell within the ancient-documents exception, subject to unresolved issues involving hearsay within the articles.
4. The newspaper articles were self-authenticating under Federal Rule of Evidence 902(6), and, independently, Plaintiff made the showing required to authenticate them as ancient documents under Rule 901(b)(8).

KEY QUOTATIONS

“Trial courts have “wide latitude” to control the admission of evidence before trial.” (Legal Standard)

“When testifying, “an expert witness is prohibited from rendering a legal opinion.”” (Rebuttal Report discussion)

“Admissibility depends on “whether the particular opinion is based on valid reasoning and reliable methodology,” not whether the “opinion has the best foundation or whether it is demonstrably correct.””

(Opening Report discussion)

“In conclusion, the Court GRANTS IN PART the Daubert Motion as to Mt. Hampton’s entire rebuttal testimony and portions of his opening testimony that speculate, discuss fact witness testimony in this case, are irrelevant, or rely on materials that post-date this case to support standards in effect in 1993; DENIES IN PART the Daubert Motion as to testimony based in training and experience that analyzes the PPD’s practices in 1993, the consistency of the PPD’s practices with other departments’ practices, and how police practices and standards evolved over time; DENIES IN PART the Newspaper Motion as to Defendants’ hearsay and authentication arguments; and RESERVES judgment on all remaining arguments and in limine motions.”

(Conclusion)

FACTUAL BACKGROUND

Kelley alleges that he was wrongfully incarcerated for a 1993 murder and robbery for 24 years until DNA testing led the trial court to vacate his convictions and the State declined to retry him. He sued members of the Paterson Police Department and the City of Paterson under 42 U.S.C. § 1983, including a Monell claim, and under state law. Paterson offered Ronald Hampton, a 25-year New Jersey State Police veteran, as an expert on Paterson police policies and procedures, while Kelley offered newspaper articles concerning alleged police misconduct during the period surrounding his interrogation, arrest, and trial.

PROCEDURAL HISTORY

Eric Kelley brought federal and state-law claims arising from his alleged wrongful conviction and 24-year incarceration. The case proceeded toward a March 2, 2026 trial after the Court denied summary judgment in part and declined to reconsider that ruling. Before trial, Plaintiff moved under Daubert to exclude Ronald Hampton's expert testimony, and Paterson moved to exclude newspaper articles; the Court ruled in part on those motions and reserved judgment on remaining arguments and motions.

DISPOSITION

other

CASES CITED

- United States v. Romano, 849 F.2d 812, 815 (3d Cir. 1988)
- United States v. Tartaglione, 228 F. Supp. 3d 402, 406 (E.D. Pa. 2017)
- Leonard v. Stemtech Health Sciences, Inc., 981 F. Supp. 2d 273, 276 (D. Del. 2013)
- Daubert v. Merrell Dow Pharmaceuticals, Inc., 509 U.S. 579, 592 n.10, 593-96 (1993)
- Pineda v. Ford Motor Co., 520 F.3d 237, 244, 247-48 (3d Cir. 2008)
- Kannankeril v. Terminix International, Inc., 128 F.3d 802, 806 (3d Cir. 1997)
- Padillas v. Stork-Gamco, Inc., 186 F.3d 412, 418 (3d Cir. 1999)
- Oddi v. Ford Motor Co., 234 F.3d 136, 145-46 (3d Cir. 2000)
- Berkeley Investment Group, Ltd. v. Colkitt, 455 F.3d 195, 217-18 (3d Cir. 2006)
- M.S. by and through Hall v. Susquehanna Township School District, 969 F.3d 120, 129 (3d Cir. 2020)

- *Toscano v. Case*, No. 11-cv-04121, 2013 WL 5333206, at *9 (D.N.J. Sept. 20, 2013)
- *United States v. Ward*, 169 F.2d 460, 462 (3d Cir. 1948)
- *S.L.Y. v. Roman Catholic Diocese of Paterson*, No. 20-cv-02605, 2024 WL 1231333, at *6 (D.N.J. Mar. 21, 2024)
- *Aloe Coal Co. v. Clark Equipment Co.*, 816 F.2d 110, 114 (3d Cir. 1987)
- *Jefferson v. Lias*, No. 15-cv-01086, 2022 WL 4550144, at *9 (D.N.J. Sept. 28, 2022)
- *Kumho Tire Co. v. Carmichael*, 526 U.S. 137, 141 (1999)
- *Fedorczyk v. Caribbean Cruise Lines, Ltd.*, 82 F.3d 69, 75 (3d Cir. 1996)
- *White v. City of Birmingham*, 96 F. Supp. 3d 1260, 1274 (N.D. Ala. 2015)
- *Young v. Pleasant Valley School District*, No. 07-cv-00854, 2011 WL 3651796, at *1 (M.D. Pa. Aug. 18, 2011)
- *Express Homebuyers USA, LLC v. WBH Marketing, Inc.*, 323 F. Supp. 3d 784, 788 & n.3 (E.D. Va. 2018)

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