

LOUISIANA COURT OF APPEAL, FIRST CIRCUIT

State of Louisiana v. James H. Dudley

2025 KW 1207 · No. 2025 KW 1207 · Decided March 24, 2026

SUMMARY

The Louisiana Court of Appeal, First Circuit, granted the State's supervisory writ and held that a “hookup text” was inadmissible at trial for cross-examining the victim under the rape shield statute. The court stated that the defendant's right to present a defense does not require admission of irrelevant evidence or evidence with minimal probative value, while noting that the State conceded admissibility of a separate 2:16 a.m. text.

CASE DETAILS

COURT	Louisiana Court of Appeal, First Circuit
WRITING FOR THE COURT	McClendon, C.J.; Greene, J.; Stromberg, J.
JURISDICTION	Louisiana Court of Appeal, First Circuit
DECIDED	March 24, 2026
DOCKET	2025 KW 1207
DISPOSITION	writ_granted
PROCEDURAL POSTURE	The State sought supervisory writs from an interlocutory district-court ruling that a text message was admissible for cross-examination of the victim.
STANDARD OF REVIEW	Abuse of discretion
PRECEDENTIAL VALUE	Unknown
PARTIES	State of Louisiana v. James H. Dudley

TOPICS

- criminal procedure
- evidence
- appellate procedure
- relevance
- standard of review

PRACTICE AREAS

- Criminal procedure
- Evidence
- Appellate procedure

QUESTIONS PRESENTED

1. Whether the district court abused its discretion by ruling that the hookup text was admissible at trial for purposes of cross-examining the victim.
2. Whether the defendant's right to present a defense required admission of the text despite the rape shield statute and the text's limited probative value.

HOLDINGS

1. The district court abused its discretion by ruling that the hookup text was admissible at trial for purposes of cross-examining the victim.
2. Because the State conceded the admissibility of the 2:16 a.m. text, the defendant was not barred from arguing or eliciting testimony that A.B. had sex with the defendant while believing him to be C.T.D.

KEY QUOTATIONS

“The right to present a defense does not mandate that the trial court permit the introduction of irrelevant evidence or evidence that has so little probative value so that it is substantially outweighed by other legitimate considerations in the administration of justice.”

FACTUAL BACKGROUND

The case involves a criminal prosecution in which the defendant sought to use a text message concerning an alleged sexual encounter with the victim during cross-examination. The district court ruled the text admissible. The State sought supervisory review of that ruling, while conceding the admissibility of a separate 2:16 a.m. text.

PROCEDURAL HISTORY

The Twenty-Second Judicial District Court for St. Tammany Parish, docket number 2940-F-2021, ruled that the so-called hookup text was admissible at trial for purposes of cross-examining the victim. The Louisiana Court of Appeal, First Circuit, granted the State's supervisory writ and held that the district court abused its discretion.

DISPOSITION

writ_granted

CASES CITED

- State v. Curtin, 2022-1110 (La. App. 1st Cir. 10/5/23), 376 So. 3d 918, writ denied, 2023-01464 (La. 4/23/24), 383 So. 3d 603
- State v. Dillon, 2018-0027 (La. App. 1st Cir. 9/21/18), 2018 WL 4520463, at *8 (unpublished)

OPINION

PER CURIAM.

STATE OF LOUISIANA COURT OF APPEAL, FIRST CIRCUIT STATE OF LOUISIANA NO. 2025 KW 1207 VERSUS JAMES H. DUDLEY MARCH 24, 2026 In Re: State of Louisiana, applying for supervisory writs, 22nd Judicial District Court, Parish of St. Tammany, No. 2940- F-2021. BEFORE: McCLENDON, C. J., GREENE AND STROMBERG, JJ. WRIT GRANTED.

The district court abused its discretion in ruling the " hookup text" is admissible at trial for purposes of cross- examining the victim. The right of a defendant to present a defense is balanced against the victim' s interests under the rape shield statute, which is meant to protect the victim of rape from having her sexual history made public. See La. Code Evid. art. 412(A) & (F); State v. Curtin, 2022- 1110 (La. App. 1st Cir.

10/ 5/ 23), 376 So. 3d 918, writ denied, 2023- 01464 (La. 4/ 23/ 24), 383 So. 3d 603. The right to present a defense does not mandate that the trial court permit the introduction of irrelevant evidence or evidence that has so little probative value so that it is substantially outweighed by other legitimate considerations in the administration of justice. State v. Dillon, 2018- 0027 (La. App.

1st Cir. 9/ 21/ 18), 2018 WL 4520463, * 8(unpublished). HG TPS McClendon, C. J., concurs. The State is conceding the admissibility of the 2: 16 a. m. text; therefore, defendant is not barred from arguing or eliciting testimony that A. B. had sex with defendant believing him to be CTD. COURT OF APPEAL, FIRST CIRCUIT DEPUTY CLERK OF COURT FOR THE COURT