

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
INDIANA, INDIANAPOLIS DIVISION

Carlton Wright v. Shane Nelson, Krul Lieutenant, Gard Captain, and
Lee Sergeant

Wright · No. 1:23-cv-00459-TWP-MKK · Decided February 17, 2026

SUMMARY

The United States District Court for the Southern District of Indiana denied Defendants' belated motion in limine seeking to exclude many of Plaintiff's proposed exhibits. The court held that the motion was untimely, motions in limine were unnecessary in the bench trial, and the evidentiary objections could not be resolved before Plaintiff offered the documents and established their purposes and foundations.

CASE DETAILS

COURT	United States District Court for the Southern District of Indiana, Indianapolis Division
WRITING FOR THE COURT	Tanya Walton Pratt
JURISDICTION	United States District Court for the Southern District of Indiana
DECIDED	February 17, 2026
DOCKET	1:23-cv-00459-TWP-MKK
DISPOSITION	other
PROCEDURAL POSTURE	Defendants filed a belated motion in limine seeking to exclude many of Plaintiff's proposed exhibits before a bench trial.
PRECEDENTIAL VALUE	unpublished, nonprecedential district court order
PARTIES	Shane Nelson, Krul Lieutenant, Gard Captain, Lee Sergeant v. Carlton Wright

TOPICS

- motion in limine
- evidence
- authentication
- hearsay
- civil procedure

PRACTICE AREAS

- evidence
- civil procedure
- civil rights

QUESTIONS PRESENTED

1. Whether Defendants' late-filed motion in limine should be granted to exclude Plaintiff's proposed exhibits.
2. Whether the challenged exhibits could be excluded in advance based on alleged authentication defects, hearsay, or lack of personal knowledge.

HOLDINGS

1. The motion in limine was denied because it was filed more than five weeks after the deadline established by the Final Pretrial Conference Order.
2. The court declined to exclude the exhibits at the motion-in-limine stage because the admissibility questions depended on the purpose for which Plaintiff would offer the documents and on whether witnesses could authenticate them or establish personal knowledge.
3. A motion in limine was not necessary for the stated purpose of preventing prejudicial evidence from being presented to a jury because this was a bench trial.

KEY QUOTATIONS

"motions in limine "perform[] a gatekeeping function and permit[] the trial judge to eliminate from further consideration evidentiary submissions that clearly ought not be presented to the jury because they clearly would be inadmissible for any purpose.""

"The movant has the burden of demonstrating that the evidence is inadmissible on any relevant ground, for any purpose.""

FACTUAL BACKGROUND

Defendants sought to exclude Plaintiff's proposed exhibits based on authentication, hearsay, and lack of personal knowledge. The case was proceeding to a bench trial, and the court noted that witnesses might be able to authenticate or establish personal knowledge of many of the challenged exhibits.

PROCEDURAL HISTORY

The Final Pretrial Conference Order set January 7, 2026, as the deadline for motions in limine. Defendants filed their motion on February 13, 2026, and the court denied it on February 17, 2026, as untimely and independently because the evidentiary objections could not be resolved before the exhibits were offered and their purposes established.

DISPOSITION

other

CASES CITED

- Jonasson v. Lutheran Child & Family Services, 115 F.3d 436, 440 (7th Cir. 1997)

- City of Joliet v. Mid-City National Bank of Chicago, No. 05 C 6746, 2012 WL 5463792, at *11 (N.D. Ill. Nov. 5, 2012)
- Stewart v. Jackson, 2021 WL 1660976, at *1 (N.D. Ind. Apr. 28, 2021)

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