

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF  
GEORGIA, VALDOSTA DIVISION

Jordan Hunter v. Warden Jacob Beasley

Hunter v. Beasley · No. 7:22-cv-144-WLS-ALS · Decided January 27, 2026

SUMMARY

The United States District Court for the Middle District of Georgia ruled on Defendant Warden Jacob Beasley’s motion in limine in Jordan Hunter’s prisoner civil-rights action. The court denied the motion in part and granted it in part, allowing specified evidence subject to relevance foundations, notice, and rulings outside the jury’s presence, while reserving objections to particular evidence for trial.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Middle District of Georgia, Valdosta Division                                                                                                                                                                             |
| WRITING FOR THE COURT | W. Louis Sands, Sr. Judge                                                                                                                                                                                                                                      |
| JURISDICTION          | United States District Court for the Middle District of Georgia, Valdosta Division                                                                                                                                                                             |
| DECIDED               | January 27, 2026                                                                                                                                                                                                                                               |
| DOCKET                | 7:22-cv-144-WLS-ALS                                                                                                                                                                                                                                            |
| DISPOSITION           | other                                                                                                                                                                                                                                                          |
| PROCEDURAL POSTURE    | Defendant moved in limine to exclude categories of evidence before trial. The court ruled on the motion without prejudice in several respects and granted it in part as to the conditions governing introduction of other-act, policy, and insurance evidence. |
| STANDARD OF REVIEW    | The court applied the preliminary and discretionary nature of motions in limine, together with the Federal Rules of Evidence governing relevance, character evidence, hearsay, and liability-insurance evidence.                                               |
| PRECEDENTIAL VALUE    | nonprecedential                                                                                                                                                                                                                                                |

TOPICS

- motion in limine
- evidence
- relevance
- hearsay
- character evidence

PRACTICE AREAS

## QUESTIONS PRESENTED

1. Whether evidence concerning other claims and other parties should be excluded when the movant did not identify the specific evidence sought to be excluded.
2. Whether evidence of Beasley's other acts should be categorically excluded as improper character or propensity evidence.
3. Whether evidence concerning policies of the State of Georgia or Georgia Department of Corrections, including alleged policy violations, should be categorically excluded.
4. Whether a motion in limine should categorically exclude hearsay evidence without identifying particular testimony.
5. Whether evidence of liability insurance should be categorically excluded or instead addressed through specific objections and a showing of a permissible purpose.

## HOLDINGS

1. Motions in limine are disfavored, preliminary, and subject to revision at trial based on the evidence, objections, and arguments presented.
2. The motion to preclude evidence concerning other claims and other parties was denied without prejudice because the defendant did not specifically identify the evidence at issue.
3. The motion to preclude all evidence of Beasley's other acts was denied in part and granted in part. Hunter may introduce such evidence only after laying a proper foundation showing relevance, providing notice to opposing counsel and the court, and obtaining a ruling outside the jury's presence.
4. The motion to categorically exclude evidence concerning State of Georgia or Georgia Department of Corrections policies, including alleged violations of those policies, was denied in part and granted in part. Such evidence may be introduced only after a proper foundation showing relevance, with notice and a ruling outside the jury's presence.
5. The motion to preclude hearsay was denied without prejudice because a generalized request to enforce the Federal Rules of Evidence did not present a concrete evidentiary issue; specific hearsay objections could be raised at trial.
6. The motion to categorically preclude evidence that Beasley was insured against liability was denied in part and without prejudice. Such evidence is generally inadmissible to prove liability or wrongful conduct, but may be admissible for another proper purpose; the proponent must first show relevance and a permissible ground for admission after notice and outside the jury's presence.

## KEY QUOTATIONS

*“the real purpose of a motion in limine is to avoid the introduction of evidence at trial that is “clearly inadmissible on all potential grounds” and could irretrievably impact the fairness of the trial.” (Section II.A)*

*“in limine rulings to admit or exclude evidence are always preliminary and conditioned on what the evidence shows at trial.”* (Section II.A)

*“Evidence that a person was or was not insured against liability is not admissible to prove whether the person acted negligently or otherwise wrongfully.”* (Section III.E)

## FACTUAL BACKGROUND

Jordan Hunter, an inmate in the Georgia Department of Corrections, transferred to Valdosta State Prison on August 13, 2022. He alleges that Warden Jacob Beasley placed him in administrative segregation without a hearing or required ninety-day reviews and that the conditions of segregation violated the Eighth Amendment. Beasley denies violating Hunter's constitutional rights.

## PROCEDURAL HISTORY

Hunter, a Georgia inmate, sued Warden Jacob Beasley under the Fourteenth Amendment and Eighth Amendment concerning administrative segregation at Valdosta State Prison. After claims were narrowed to procedural-due-process and conditions-of-confinement claims, Beasley filed a motion in limine. The court held a pretrial conference, treated briefing as complete because Hunter had not filed a response, and issued this order addressing five categories of evidence.

## DISPOSITION

other

## CASES CITED

- Royal Marco Point 1 Condo. Ass’n v. QBE Ins. Corp., No. 2:07-cv-16-FtM-99SPC, 2011 WL 470561, at \*2 (M.D. Fla. Feb. 2, 2011)
- Luce v. United States, 469 U.S. 38, 41 (1984)
- Rosenfeld v. Oceania Cruises, Inc., 682 F.3d 1320, 1325 (11th Cir. 2012)
- Ohler v. United States, 529 U.S. 753, 758 n.3 (2000)
- United States v. Astling, 733 F.2d 1446, 1455 (11th Cir. 1984)
- Bruton v. United States, 391 U.S. 123, 135 (1968)
- United States v. Fuentes, 521 F. App’x 911, 911 (11th Cir. 2013) (per curiam)
- Williams v. Harvey, 858 S.E.2d 479, 492 (Ga. 2021) (Bethel, J., concurring)
- Cephus v. CSX Transp., Inc., 771 F. App’x 883, 894-95 (11th Cir. 2019) (per curiam)