

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
INDIANA

Williams v. Tulino

Williams · No. 1:22-cv-02267-JPH-CSW · Decided January 20, 2026

SUMMARY

The United States District Court for the Southern District of Indiana ruled on the Defendant's motions in limine in a remanded employment-discrimination action involving an alleged racially hostile work environment at the Carmel Post Office. The court granted motions excluding evidence concerning dismissed claims, prior bad acts of Postal Service employees, inadmissible hearsay, and an undisclosed audio recording. The court overruled the plaintiff's general objection to the motions in limine.

CASE DETAILS

COURT	United States District Court for the Southern District of Indiana
WRITING FOR THE COURT	James Patrick Hanlon
JURISDICTION	United States District Court for the Southern District of Indiana
DECIDED	January 20, 2026
DOCKET	1:22-cv-02267-JPH-CSW
DISPOSITION	other
PROCEDURAL POSTURE	Order resolving the defendant's four motions in limine after remand of the plaintiff's racially hostile work environment claim.
STANDARD OF REVIEW	Motions in limine are reviewed under the court's broad discretion in ruling on evidentiary questions; such rulings are preliminary and may be changed as the trial unfolds.
PRECEDENTIAL VALUE	unpublished
PARTIES	Baseemah Williams v. Douglas Tulino, Acting Postmaster General

TOPICS

- [motion in limine](#)
- [hearsay](#)
- [character evidence](#)
- [relevance](#)
- [evidence](#)

PRACTICE AREAS

- [evidence](#)
- [civil procedure](#)
- [employment law](#)
- [civil rights](#)
- [federal employment law](#)

QUESTIONS PRESENTED

1. Whether evidence relating to Williams's claims that had been dismissed and affirmed on appeal was relevant and admissible in the remaining hostile work environment trial.
2. Whether evidence of other complaints, lawsuits, discipline, arrests, convictions, or other bad acts by Postal Service witnesses was admissible to show that they acted in accordance with a purported character or propensity.
3. Whether handwritten statements and other out-of-court statements by Postal Service employees were admissible when offered to prove the truth of the matters asserted.
4. Whether an audio recording and its contents, not produced during discovery, should be excluded under Federal Rule of Evidence 403.

HOLDINGS

1. Evidence concerning Williams's dismissed age discrimination, retaliation, wrongful termination, and assault claims was irrelevant to the sole claim remaining on remand and was inadmissible, subject to a possible later showing that a specific fact was probative of the hostile work environment claim.
2. Evidence of other bad acts by Postal Service employees was excluded when offered to show that the witnesses had a character or propensity to act in a racially hostile manner.
3. The Postal Service employees' handwritten statements and other out-of-court statements were excluded when offered to prove the truth of the matters asserted because they constituted hearsay and no applicable exception had been shown.
4. The alleged audio recording and references to it were excluded under Rule 403 because its diminished probative value was substantially outweighed by the dangers of confusing the issues, causing undue delay, wasting time, and creating a mini-trial.

KEY QUOTATIONS

“Motions in limine are designed to “streamline trials and settle evidentiary disputes in advance, so that trials are not interrupted mid-course for the consideration of lengthy and complex evidentiary issues.”” (section II)

“Still, orders in limine are preliminary and “subject to change when the case unfolds” because actual testimony may differ from a pretrial proffer.” (section II)

“Under Federal Rule of Evidence 404(b)(1), “[e]vidence of a crime, wrong, or other act is not admissible to prove a person’s character in order to show that on a particular occasion the person acted in accordance with the character.”” (section II.2)

“However, any probative value of the evidence is diminished by the fact that Ms. Williams, Julia Dunn, and Lisa Dalton can testify at trial as to the statements made during the conversation.” (section II.4)

FACTUAL BACKGROUND

Williams, a former U.S. Postal Service employee, pursued a remaining claim that the Postal Service created a racially hostile work environment at the Carmel Post Office. The defendant sought to exclude evidence

concerning dismissed claims, other alleged misconduct by Postal Service witnesses, out-of-court statements, and an audio recording not produced during discovery. The court found the proposed evidence either irrelevant, impermissible propensity evidence, hearsay, or substantially outweighed by risks of confusion, delay, and a mini-trial.

PROCEDURAL HISTORY

Williams sued the Postmaster General for assault, retaliatory discharge, wrongful termination, and race- and age-based hostile work environment harassment. The district court entered summary judgment for the defendant on all claims. The Seventh Circuit affirmed except as to the claim that the Postal Service created a racially hostile work environment at the Carmel Post Office, vacated that portion of the judgment, and remanded. On remand, the district court granted the defendant's motions in limine and overruled Williams's objection.

DISPOSITION

other

REMAND INSTRUCTIONS

Williams may seek to introduce otherwise excluded evidence by raising a specific issue outside the jury's presence, during a break or at sidebar. The parties may introduce testimony based on personal knowledge concerning observations, conversations, and occurrences during the meeting, but may not reference the excluded audio recording.

CASES CITED

- United States v. Tokash, 282 F.3d 962, 968 (7th Cir. 2002)
- Jenkins v. Chrysler Motors Corp., 316 F.3d 663, 664 (7th Cir. 2003)
- Luce v. United States, 469 U.S. 38, 41 (1984)
- Ohler v. United States, 529 U.S. 753, 758 n.3 (2000)
- Barnes v. General Motors LLC, 2023 WL 3436098, No. 4:20-cr-00087-TWP-KMB (S.D. Ind. May 12, 2023)
- United States v. Gomez, 763 F.3d 845, 860 (7th Cir. 2014) (en banc)
- Manuel v. City of Chicago, 335 F.3d 592, 597 (7th Cir. 2003)
- United States v. Wehrle, 985 F.3d 549, 555 (7th Cir. 2021)
- Schindler v. Seiler, 474 F.3d 1008, 1011 (7th Cir. 2007)
- Henderson v. Wilkie, 966 F.3d 530, 538 (7th Cir. 2020)