

CAUSE NO. 23-CR-4555

THE STATE OF TEXAS	§	IN THE 10 <sup>TH</sup> JUDICIAL
	§	
v.	§	DISTRICT COURT OF
	§	
CONNOR LYNN HILTON	§	GALVESTON COUNTY, TEXAS

MOTION IN LIMINE  
(STATEMENTS MADE WHILE UNDER ARREST)

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, CONNOR LYNN HILTON, the Defendant in the above styled and numbered cause and respectfully requests this honorable Court to instruct the prosecution not to mention, allude to, or refer to, directly or indirectly, during any stage of this trial, including but not limited to the voir dire examination, opening statements, and the direct and cross-examination of any witness, the fact that the Defendant herein may have made a statement immediately after he was detained and/or arrested in this cause, to any law enforcement official or agent thereof, until such time as a hearing has been conducted out of the hearing of the jury to determine the admissibility of any such testimony.

The Defendant further requests that this Court instruct the prosecution to advise the Court prior to eliciting any such testimony in order for the Court to excuse the jury and conduct a hearing outside the presence of the jury, without the necessity of counsel for the Defendant having to object to said testimony and request that the hearing be held outside the presence of the jury.

Any oral statements made by the Defendant were not made and preserved in compliance with the requirements of Tex. Code Crim. Proc. art. 38.22. Evidence seized in violation of the Constitution or laws of the State of Texas or the United States is not admissible against the accused. Tex. Code Crim. Proc. art. 38.23; Article 1, § 9 of the Texas Constitution; 4th Amendment to the United States Constitution.

WHEREFORE, PREMISES CONSIDERED, the Defendant respectfully prays that the honorable Court will grant this Motion In Limine.

Respectfully submitted,

/s/ Jennifer "JL" Carpenter  
Jennifer "JL" Carpenter  
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Attorney for Defendant

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Motion in Limine (Statements Made While under Arrest) has been served on the Assistant District Attorney representing the State of Texas via electronic service on the 27<sup>th</sup> of December, 2023.

/s/ Jennifer "JL" Carpenter  
Jennifer "JL" Carpenter

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Associated Case Party: CONNORLYNNHILTON

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