

**IN THE CIRCUIT COURT,  
SEVENTH JUDICIAL CIRCUIT, IN AND FOR  
FLAGLER COUNTY, FLORIDA**

**CASE NO.: 17-00735-CFFA**

**STATE OF FLORIDA**

**VS.**

**BRUCE PATRICK HAUGHTON  
DEFENDANT.**

---

**MOTION IN LIMINE**

COMES NOW, R.J. LARIZZA, State Attorney for the Seventh Judicial Circuit of Florida, by and through the undersigned Assistant State Attorney, and files this Motion in Limine for the court to deny the Defendant in any trial in this cause to introduce into evidence additional attempts to commit suicide or Baker Act proceedings after the offense date in this case. In support of this motion, the State would show the following:

1. The State intends to prove that the Defendant assisted in the self-murder of Katherine Goddard on June 30, 2017.
2. The Defendant was not arrested on this charge until August 16, 2017.
3. Between the offense and arrest dates, the Defendant had contact with law enforcement on several occasions and Baker Act proceedings were instituted by law enforcement.
4. The State does not intend on introducing any evidence or argument that on June 30, 2017, the Defendant was *not* attempting to kill himself in addition to assisting Katherine Goddard in her attempt.
5. The State seeks to prevent the Defendant from introducing evidence of any statements or acts related to subsequent suicide attempts, as it does not prove a material element of the crime and would only be introduced to invoke sympathy towards the Defendant.

WHEREFORE, the State prays that this Court will enter an order not allowing the Defendant to present evidence of such throughout this trial.

R.J. LARIZZA  
STATE ATTORNEY

By: s/JENNIFER L DUNTON  
ASSISTANT STATE ATTORNEY  
Florida Bar No.: 0014274  
ESERVICEFLAGLER@SAO7.ORG

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy hereof has been furnished by mail/delivery to ROSEMARIE PEOPLES, 4010 LEWIS SPEEDWAY SUITE 1101, SAINT AUGUSTINE, FL 32084, on May 20, 2019.

s/JENNIFER L DUNTON  
ASSISTANT STATE ATTORNEY  
Florida Bar No.: 0014274  
1769 EAST MOODY BLVD, BLDG 1  
BUNNELL, FL 32110  
(386) 313-4300  
ESERVICEFLAGLER@SAO7.ORG