

IN THE IOWA DISTRICT COURT FOR SIOUX COUNTY

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STATE OF IOWA,

NO 03841 SMSM026797

Plaintiff,

Vs.

PAUL ROBERT DORR,

MOTION IN LIMINE TO SUPPRESS

Defendant.

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COMES NOW PAUL ROBERT DORR and for this Motion In Limine To Suppress, respectfully states:

1. The State of Iowa has listed as an intended exhibit a video which is believed to be a copy of a video which this defendant allegedly created and posted on Facebook and which purports to show certain events involved herein.

2. Presumably the State of Iowa intends to use **inadmissible hearsay** testimony in its attempt to authenticate this video and thus lay a foundation for the admission of this video.

3. Even then the basic rules of evidence for a foundation for authenticating the video cannot be met (Rules of Evidence 5.901): the state does not have a witness that the video truly and accurately depicts the events that it purports to show and portray. Social media is commonly known to be easily manipulated and altered.

4. The person who can do so is the defendant, Paul Robert Dorr, who will not waive his 5<sup>th</sup> Amendment right to not be called as a witness against himself.

5. Any witness brought by the State should also be prohibited from testifying about the video and the alleged contents thereof because it is **inadmissible hearsay**.

Wherefore the defendant PAUL ROBERT DORR prays the court to enter an order to suppress any and all video originating from social media and any and all references thereto by any and all witnesses.

July 27, 2019

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Date

Paul R Dorr

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Paul Robert Dorr, Defendant  
(Pro Se)