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WASHINGTON COUNTY
BY _____

*Rec'd
9 Jul 07
Ordered filed
30 Oct 07
A*

IN THE FIFTH DISTRICT COURT

WASHINGTON COUNTY, STATE OF UTAH

STATE OF UTAH,

Plaintiff,

vs.

WARREN STEED JEFFS,

Defendant.

**MOTION IN LIMINE TO EXCLUDE
RECORDED JAIL CONVERSATIONS**

[FILED UNDER SEAL]

Case No. 061500526

Judge James L. Shumate

The Defendant, Warren Steed Jeffs, respectfully moves this Court to exclude certain conversations between the Defendant and his family and friends recorded by jail officials at the Purgatory Correctional Facility. The jailhouse recordings meet none of the criteria for admissibility under Rule 404(b) of the Utah Rules of Evidence. The

Defendant's jailhouse statements are being offered for impermissible character purpose irrelevant to the instant charges. Finally, to the extent that the evidence bears any relevance to an element of the charged offenses, Rule 403 of the Utah Rules of Evidence dictates exclusion of these statements because the prejudicial impact substantially outweighs any limited probative value. A Memorandum in Support of his Motion is filed contemporaneously.

DATED this _____ day of July, 2007.

BUGDEN & ISAACSON, L.L.C.

By: _____
WALTER F. BUGDEN, JR.
TARA L. ISAACSON

WRIGHT, JUDD & WINCKLER
RICHARD A. WRIGHT

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that, on the ___ day of July, 2007, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

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