

IN THE CIRCUIT COURT OF THE COOK COUNTY, ILLINOIS
MUNICIPAL DEPARTMENT –FIRST DISTRICT

MARIA S SAYAVONGSA.,)
 Plaintiff,)
)
v.) No.: 10 M1 106807
)
EXOTIC MOTORS,)
 Defendants.)

MOTION IN LIMINE
(Presence of Plaintiff’s Counsel’s Companion at Counsel’s Table at Trial).

Now Comes your Defendant, Exotic Motors, by and through their attorneys, Gauthier & Gooch, and as for their Motion as aforesaid states to the Court as follows:

1. That Defendant’s counsel is anecdotally familiar with the tactics and theatrics of Plaintiff’s counsel, Dmitry N. Foefanov. Such behavior includes having a large breasted woman sit next to him at counsel’s table during the course of the trial. There is no evidence whatsoever that this woman has any legal training whatsoever, and the sole purpose of her presence at Plaintiff’s Counsel’s table is to draw the attention of the jury away from the relevant proceedings before this court, obviously prejudicing the Defendant’s in this or any other cause. Until it is shown that this woman has any sort of legal background, she should be required to sit in the gallery with the rest of the spectators and be barred from sitting at counsel’s table during the course of this trial.

Respectfully Submitted,
On behalf of Exotic Motors, Inc.
Gauthier & Gooch

Gauthier & Gooch
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Thomas W. Gooch III