**STATE OF ILLINOIS**

**IN THE CIRCUIT COURT OF THE COUNTY OF COOK**

PEOPLE OF THE STATE OF ILLINOIS )

PLAINTIFF, )

)

) CRIMINAL

VS ) No. 02 CF 1618

) (DuPage County)

)

SKYLER M. CHAMBERS )

DEFENDANT. )

**MOTION IN LIMINE**

**(Re: Post-mortem photographs of victim)**

NOW COMES the Defendant, SKYLER M. CHAMBERS, by one of his attorneys, Robert A. Miller, DuPage County Public Defender, and moves the Court to enter an Order prohibiting the State from publishing to the jury any post mortem photographs to the jury until the Court has ruled on each photograph. In support hereof, it is stated as follows:

1. That the Defendant is charged with the Murder, Aggravated Criminal Sexual Assault, Criminal Sexual Assault, Aggravated Kidnapping, Kidnapping, Child Abduction, and Concealment of a Homicidal Death, allegedly occurring on May 31, 2003.

2. That the defendant believes that the State will attempt to introduce several post-death photographs of the victim Nassim Davoodi, including but not limited to autopsy photographs.

3. That the introduction into evidence of many of the post-mortem photographs would be irrelevant.

4. That the publication to the jury of many of the post-mortem photographs would be cumulative, as well as more prejudicial than probative.

WHEREFORE, the Defendant asks that this Court to enter an Order prohibiting the State from publishing to the jury any post mortem photographs to the jury until the Court has ruled on each photograph.

SKYLER M. CHAMBERS, Defendant

By\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Robert A. Miller, One Of His Attorneys

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