

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND

STATE OF MARYLAND	)	
V.	)	CT07-1664X
KEITH WASHINGTON	)	

STATES COMBINED MOTION IN LIMINE AND MEMORANDUM -  
CONVICTIONS OF ROBERT WHITE

The State believes the victim, Robert White, to have the following criminal convictions:

- |   |  |   |
|---|--|---|
| 7/10/89 Hampton, Va. General District Court | Unlawful Entry                               | — |
| 7/10/89 Hampton, Va. General District Court | Larceny                                      | — |
| 6/7/91 Georgetown, Co., S.C.                | Receiving Stolen Goods                       | ✓ |
| 6/7/91 Georgetown Co., S.C                  | Attempted 3 <sup>rd</sup> Degree Burglary    | — |
| 8/3/93 Georgetown Co., S.C.                 | Grand Larceny                                | — |
| 6/16/94 Georgetown Co., S.C.                | Pointing a Firearm                           | ✓ |
| 4/27/95 Georgetown Co., S.C.                | Receiving Stolen Goods                       | ✓ |
| 6/14/95 Georgetown Co., S.C.                | Assault and Battery                          | — |
| 12/13/95 Georgetown Co., S.C.               | First Degree Burglary                        | ✓ |
| 12/13/95 Georgetown Co., S.C.               | Assault with Intent to Commit Sexual Conduct | ✓ |
| 1/27/05 Georgetown Co., S.C.                | Domestic Violence                            | ✓ |

The State does hereby move the Court to order that the defense not be permitted to impeach the testimony of Mr. White by introducing evidence of the 1989 Hampton, Va. convictions; the 1991 Georgetown Co., S.C. convictions; the 1994 Georgetown Co., S.C. Pointing a Firearm conviction; the 1995 Georgetown Co., S.C. Assault and Battery conviction; the 1995 Georgetown Co., S.C. First Degree Burglary and Assault with Intent to Commit Sexual Conduct convictions; and the 2005 Georgetown Co., S.C. Domestic Violence conviction.