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4 JUDICIAL COMMITTEE

5 LIBERTARIAN PARTY OF CALIFORNIA

6 ROBERT & JENNIFER IMHOFF-DOUSARM

7 Plaintiffs,

8 vs.

9 HONOR "MIMI" ROBSON, CHAIR – LIBERTARIAN
10 PARTY OF CALIFORNIA,

11 Defendant

MOTION IN LIMINE

12 Robert & Jennifer Imhoff-Dousharm, henceforth referred to as "Plaintiffs" in this motion, request
13 an evidentiary ruling be made that the content of proceedings related the motion in question has potentially
14 inflammatory characteristics or aspects that outweigh whatever materiality it possess. Therefore any submission of
15 evidence not directly related to the question of procedure should not be accepted as evidence by the Judicial
16 Committee.

17 At the core of the appeal before the Judicial Committee is the protection of The Party and the
18 Plaintiffs good standing. (RONR pp 655:5) The Plaintiffs have not been presented with investigation results, formal
19 charges, or evidence directly related to a motion to suspend their membership within The Party. If the Defendant is
20 to be allowed to disclose evidence submitted and the content of discussion related to that evidence, which was only
21 available in executive session, both the public and the Plaintiffs would gain knowledge of that information
22 simultaneously. This would violate libel protections afforded to The Party and due-process afforded to Plaintiff.
(RONR pp 655:12 & 656:1)

23 The Plaintiffs appeal centers around a process being followed, not the content therein. To disclose
24 the content of the process would be out of order, and would not be relevant to the Defendants case. The Defendant
25 only needs to demonstrate that the disciplinary process was followed in compliance with Bylaws and RONR, not
26 what the content discussed was in the course of that process, unless that content directly relates to the process itself
27 (RONR pp 656:18).

28 MOTION IN LIMINE - 1

1 The Plaintiffs agree that any public details about an accusation, publicly known motions to open
2 an investigation, and publicly discussed information related to this motion are in order.

3 The Party and the Plaintiffs still have rights to confidentiality, as it relates to the allegations.
4 Plaintiffs do not dispute that allegations for the suspension of their membership exist, however, said allegations have
5 not been disclosed to the Plaintiffs, nor publicly disclosed to any other interested parties outside of executive
6 session. Therefore, we ask that any evidence unrelated to the process being followed, be suppressed from this
7 appeal, which also includes any material evidence which only speaks to the merit of the motion to suspend.

8 Dated this 28th day of August, 2019.

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13 Robert Imhoff-Dousharm

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17 Jennifer Imhoff-Dousharm