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**FILED**  
 Superior Court of California  
 County of Los Angeles

JAN 29 2016

Sherri R. Carter, Executive Officer/Clerk  
 By Natasha Rose, Deputy  
 Natasha Rose

7 **SUPERIOR COURT OF CALIFORNIA**  
 8 **FOR THE COUNTY OF LOS ANGELES**

By Fax

11 ISABELLE GAUTHIER, an individual,

12 Plaintiff,

13 vs.

14 THOMAS SCHOENBERGER, an individual;  
 15 and DOES 1 to 20, inclusive,

16 Defendants.

Case No. BC564759

Assigned to the Hon. Mark Mooney, Dept. 68

**PLAINTIFF'S MEMORANDUM IN  
 OPPOSITION TO DEFENDANT'S  
 MOTION IN LIMINE NO. 1**

Action Filed: November 24, 2014  
 FSC: February 11, 2016  
 Trial Date: February 22, 2016

**HEARING**

Date: February 11, 2016  
 Time: 8:30 a.m.  
 Place: Department 68

20 Plaintiff Isabelle Gauthier respectfully submits this memorandum in opposition to Motion in  
 21 Limine No. 1 filed by defendant Thomas Schoenberger. Defendant seeks to exclude from evidence  
 22 any and all information regarding his criminal record. He argues that it is irrelevant, more prejudicial  
 23 than probative, and is character evidence which cannot be used to attack his credibility. Defendant's  
 24 arguments are without merit, and the Court should deny his request.

25 The basic reason why is because information relating to Defendant's criminal record is  
 26 relevant in this action for purposes *other than* attacking the credibility of his testimony at trial.

27 As alleged in the Complaint and as the evidence at trial will show, this case concerns a  
 28 swindle by Defendant, who conned Plaintiff out of about \$400,000 while they had a romantic

02/01/2016

