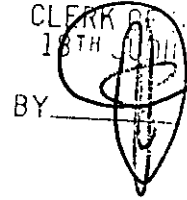


1 Chief Deputy District Attorney Kim Parker
Supreme Court #11203
2 Deputy District Attorney Ann Swegle
Supreme Court #10920
3 Office of the District Attorney
535 North Main, 2nd Floor
4 Wichita, Kansas 67203
[316] 666-3600
5
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FILED 

2009 NOV 19 P 12:37



7 IN THE EIGHTEENTH JUDICIAL DISTRICT
8 DISTRICT COURT, SEDGWICK COUNTY, KANSAS
9 CRIMINAL DEPARTMENT

10
11 STATE OF KANSAS,
12 Plaintiff,

13 vs.

14 SCOTT P. ROEDER,
15 Defendant

Case No.: Case No. 09 CR 1462

16
17
18 **STATE'S RESPONSE TO DEFENDANT'S MOTION IN LIMINE**

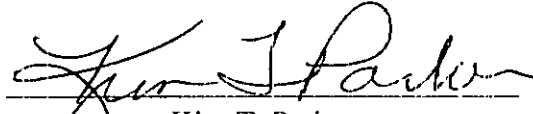
19 **Comes Now** the State of Kansas by and through its attorneys, Chief Deputy District
20 Attorney Kim T. Parker and Deputy District Attorney Ann Swegle and submits this response to
21 the defendant's motion in limine.

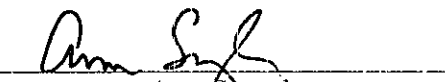
22 Defendant seeks an order restricting the State from presenting any evidence or comment
23 regarding his past criminal history or propensity to commit crimes.

24 The State has no intention of presenting any evidence or comment regarding the
25 defendant's criminal history or propensity to commit crimes in its case-in-chief. However, if the

1 defendant were to cause such evidence to become relevant through the introduction of evidence
2 in the defendant's case-in-chief, or through cross-examination in the State's case-in-chief, the
3 State reserves the right to ask the Court to permit it to introduce such evidence.

4
5 Respectfully Submitted,

6
7 
8 Kim T. Parker
9 Chief Deputy District Attorney, #11203

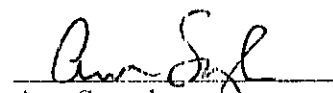
10
11 
12 Ann Swegle
13 Deputy District Attorney, #10920

14
15 **CERTIFICATE OF SERVICE**

16 This is to certify that a true and correct copy of the foregoing was delivered on this 19th-
17 day of November, 2009 to the following:

18 Mr. Charles S. Osburn
19 Mr. Mark Rudy
20 Public Defender's Office
21 604 N. Main, Suite D
22 Wichita, KS 67203

23 And a copy hand-delivered to the chambers of the Honorable Warren Wilbert on the
24 same date.

25 
Ann Swegle
Deputy District Attorney