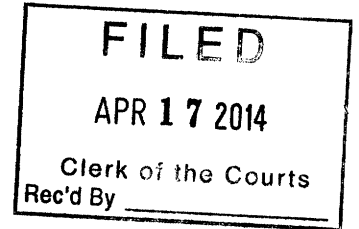


IN THE TENNESSEE BOARD OF JUDICIAL CONDUCT

IN RE: THE HONORABLE JOHN A. DONALD  
GENERAL SESSIONS JUDGE  
SELBY COUNTY, TENNESSEE

Docket No. M2013-02204-BJC-DIS-FC

File No. 11-4762



---

*Motions in Limine*

---

Your Respondent, pre-trial, moves *in limine* that all hearsay testimony or statements are not to be offered at trial by the Disciplinary Counsel:

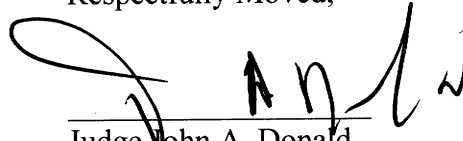
MOTION #1: Any statements from the Disciplinary Counsel as to what was authorized to him by the members of the investigative panel, including their authorizing him to sign their names to the Complaint against the Respondent, the Respondent asserts hearsay objections "*in limine*." Indeed, such testimony or statements by the Disciplinary Counsel would clearly be hearsay offered by the Counsel for truthfulness.

MOTION #2: That Disciplinary Counsel is ordered not to refer at trial or present any hearsay testimony of Mr. Gold and/or statements presented to him, in writing or verbally, Respondent also alleging that these extra judicial statement/writings are hearsay.

MOTION #3: That Disciplinary Counsel is ordered pre-trial not to opine or offer his testimony or any statements as to the disposition of Respondent's complaint against Mr. Gold by the Tennessee Board of Professional Responsibility.

Further, Respondent respectfully requests a pre-trial hearing on this Motion as should a trial be ordered, Respondent shall be expenses to subpoena a number of fact witnesses, as well as character witnesses.

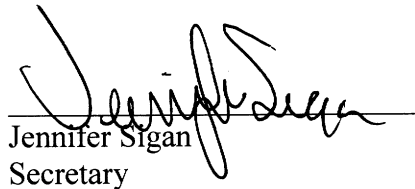
Respectfully Moved,



Judge John A. Donald  
Respondent  
140 Adams, Suite 110  
Memphis, TN 38103  
901-222-3571

Certificate of Mailing

I, Jennifer Sigan, Secretary to Judge Donald, certify that a copy of the foregoing Motion *in Limine*, has been mailed by US Mail, postage prepaid, to Mr. Michael Catalano, Appellate Court Clerk, and Mr. Tim Discenza, this 14th day of April, 2014.



Jennifer Sigan  
Secretary