

✓  
COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF THE TRIAL COURT

HAMPDEN, ss.

District Court Department  
Springfield Division  
Civil Action No.: 1143CV293

BRIAN JOHNSON )  
 )  
 PLAINTIFF/DEFENDANT- )  
 IN-COUNTERCLAIM )  
 v. )  
 )  
 PETER FREI )  
 )  
 DEFENDANT/PLAINTIFF- )  
 IN-COUNTERCLAIM )

PLAINTIFF/COUNTERCLAIM DEFENDANT'S  
MOTION IN LIMINE TO  
EXCLUDE EVIDENCE UNRELATED  
TO THE CLAIM AS ARTICULATED IN  
THE SUBSTITUTED ANSWER

FILED  
SPRINGFIELD  
DISTRICT COURT  
19 SEP 17 AM 10:16

Now comes Brian Johnson, the Plaintiff/Defendant-in-Counterclaim, in the above-referenced matter and moves that any evidence which is unrelated to the claim of abuse of process as articulated in the allegations in the Substituted Answer be excluded from evidence.

The basis for this Motion, which is further articulated in the Memorandum of Law filed simultaneously herewith, is that evidence unrelated to the facts articulated in the Substituted Answer is not relevant and therefore should be excluded.

WHEREFORE, for the reasons articulated in the Memorandum of Law, Brian Johnson respectfully moves that any evidence unrelated to the allegations articulated in the Substituted Answer be excluded from evidence at the trial of this matter.

Respectfully submitted,

The Plaintiff,  
Brian Johnson,  
By his attorney,

Tani E. Sapirstein  
Tani E. Sapirstein, Esq.  
BBO No. 236850  
Sapirstein & Sapirstein, P.C.  
1331 Main St., 2<sup>nd</sup> Floor  
Springfield, MA 01103  
Tel. (413) 827-7500  
Fax (413) 827-7797  
[tani@sandslaw.com](mailto:tani@sandslaw.com)

Dated: September 17, 2019

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above document was served upon the following  
via first class mail, postage prepaid, to:

Mr. Peter Frei  
101 Maybrook Road  
Holland, MA 01521

Dated: September 17, 2019

Tani E. Sapirstein  
Tani E. Sapirstein