

CRIMINAL DOCKET NUMBER: 190,764-B

DIVISION "B"

12TH JUDICIAL DISTRICT COURT

PARISH OF AVOYELLES

STATE OF LOUISIANA

VERSUS

NORRIS GREENHOUSE, JR.

FILED: _____ ; _____ DY.CLK.

MOTION IN LIMINE- PRINCIPAL 14:24 AND OBJECTION TO JURY CHARGE

NOW INTO COURT, through undersigned counsel, comes Defendant, **NORRIS GREENHOUSE JR.**, who respectfully moves this Honorable Court to enter an order instructing the Louisiana Attorney General's Office, his assistants, and the witnesses to be called by the State not to allude to, refer to, or in any way bring before the jury whether as a panel or a jury selected to try this cause, any of the matters stated in the lettered paragraphs below:


1. The law of Principal does not apply to the above criminal case.
2. The defendant objects to both its use in this trial and/or any and all jury charges referring to the law of Principal.
- 3.

Principal is defined by LRS 14:24 as "All persons concerned in the commission of a crime, whether present or absent, and whether they directly commit the act constituting the offense, aid and abet in its commission, or directly or indirectly counsel or procure another to commit the crime, are principals."

The undisputed facts in the above captioned matter preclude the use of the legal theory of the law of Principal in this matter.

WHEREFORE, the Defendant, **NORRIS GREENHOUSE, JR.**, respectfully request that the Court grant this Motion and exclude the use of the law of Principal in the above captioned matter.

RESPECTFULLY SUBMITTED:
HIGGINS LAW OFFICE

BY: 
GEORGE L. HIGGINS, III
Louisiana Bar Roll No. 06872
Post Office Box 3370
Pineville, Louisiana 71361-3370
(318) 473-4250
ATTORNEY FOR DEFENDANT,
NORRIS GREENHOUSE JR.

CERTIFICATE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing Motion in Limine- Principal 14:24 and objection to Jury Charge, has been forwarded to Mr. Matthew Derbes with the Louisiana Attorney General's Office, via facsimile and US Mail, this 28 day of April, 2017.


GEORGE LEWIS HIGGINS, III

CRIMINAL DOCKET NUMBER: 190,764-B

DIVISION "B"

12TH JUDICIAL DISTRICT COURT

PARISH OF AVOYELLES

STATE OF LOUISIANA

VERSUS

NORRIS GREENHOUSE, JR.

FILED: _____ ; _____ DY.CLK.

ORDER

The above and foregoing Motion considered:

IT IS ORDERED:

That the State of Louisiana, through the Office of the Attorney General, appear and show cause on the 2nd day of May 2017, at 11 o'clock A.M., why this Motion in Limine- Principal 14:24 and objection to Jury Charge, should not be granted.

THUS DONE AND SIGNED at Marksville, Avoyelles Parish, Louisiana, on this _____ day of April, 2017.

JUDGE - 12TH JUDICIAL DISTRICT COURT

CRIMINAL DOCKET NUMBER: 190,764-B

DIVISION "B"

12TH JUDICIAL DISTRICT COURT

PARISH OF AVOYELLES

STATE OF LOUISIANA

VERSUS

NORRIS GREENHOUSE, JR.

FILED: _____ ; _____ DY.CLK.

MOTION IN LIMINE- TRANSFERRED INTENT AND OBJECTION TO JURY
CHARGE

NOW INTO COURT, through undersigned counsel, comes Defendant, **NORRIS GREENHOUSE JR.**, who respectfully moves this Honorable Court to enter an order instructing the Louisiana Attorney General's Office, his assistants, and the witnesses to be called by the State not to allude to, refer to, or in any way bring before the jury whether as a panel or a jury selected to try this cause, any of the matters stated in the lettered paragraphs below:

1.

The law of Transferred Intent does not apply to the above criminal case.

2.

The defendant objects to both its use in this trial and/or any and all jury charges referring to the law of Transferred Intent.

3.

The undisputed facts in the above captioned matter preclude the use of the legal theory

of transferred intent in this matter.

WHEREFORE, the Defendant, **NORRIS GREENHOUSE, JR.**, respectfully request that the Court grant this Motion and exclude the use of the law of Transferred Intent in the above captioned matter.

RESPECTFULLY SUBMITTED:

HIGGINS LAW OFFICE

BY: 

GEORGE L. HIGGINS, III
Louisiana Bar Roll No. 06872
Post Office Box 3370
Pineville, Louisiana 71361-3370
(318) 473-4250
ATTORNEY FOR DEFENDANT,
NORRIS GREENHOUSE JR.

CERTIFICATE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing Motion in Limine- Transferred Intent and objection to Jury Charge, has been forwarded to Mr. Matthew Derbes with the Louisiana Attorney General's Office, via facsimile and US Mail, this 2nd day of April, 2017.


GEORGE LEWIS HIGGINS, III

CRIMINAL DOCKET NUMBER: 190,764-B

DIVISION "B"

12TH JUDICIAL DISTRICT COURT

PARISH OF AVOYELLES

STATE OF LOUISIANA

VERSUS

NORRIS GREENHOUSE, JR.

FILED: _____ : _____ DY.CLK.

ORDER

The above and foregoing Motion considered:

IT IS ORDERED:

That the State of Louisiana, through the Office of the Attorney General, appear and show cause on the 2nd day of May 2017, at 11 o'clock A.M., why this Motion in Limine- Transferred Intent and objection to Jury Charge, should not be granted.

THUS DONE AND SIGNED at Marksville, Avoyelles Parish, Louisiana, on this _____ day of April, 2017.

JUDGE - 12TH JUDICIAL DISTRICT COURT

CRIMINAL DOCKET NUMBER: 190,764-B

DIVISION "B"

12TH JUDICIAL DISTRICT COURT

PARISH OF AVOYELLES

STATE OF LOUISIANA

VERSUS

NORRIS GREENHOUSE, JR.

FILED: _____ : _____ DY. CLK.

NOTICE OF USE OF SELF DEFENSE, JUSTIFICATION AND DEFENSE OF OTHERS AS TO ATTEMPTED MURDER CHARGE OF CHRISTOPHER FEW

NOW INTO COURT, through undersigned counsel, comes Defendant, **NORRIS GREENHOUSE JR.**, who respectfully moves this Honorable Court that this notice be accepted under Louisiana Law as proper notice and declaration that the defendant, **NORRIS GREENHOUSE JR.**, hereby notifies the State of Louisiana through this motion the he intends to use the defense of SELF DEFENSE, JUSTIFICATION, ANF DEFENSE OF OTHERS AS TO ATTEMPTED, UNDER CHARGE OF CHRISTOPHER FEW pursuant to Louisiana RS 14:18, 14:19, 14:20, and 14:22.

1.

The defendant asserts that this defense applies only to Christopher Few. However, said defense directly affects the rulings sought by defendant in the Motions in Limine as to Principal and Transferred Intent.

WHEREFORE, the Defendant, **NORRIS GREENHOUSE, JR.**, respectfully request that the Court order that this notice complies with Louisiana law concerning notification of the above defenses.

RESPECTFULLY SUBMITTED:

HIGGINS LAW OFFICE

BY:


GEORGE L. HIGGINS, III

Louisiana Bar Roll No. 06872

Post Office Box 3370

Pineville, Louisiana 71361-3370

(318) 473-4250

ATTORNEY FOR DEFENDANT,
NORRIS GRENHOUSE JR.

CERTIFICATE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing

NOTICE OF USE OF SELF DEFENSE, JUSTIFICATION AND DEFENSE OF OTHERS AS

TO ATTEMPTED MURDER CHARGE OF CHRISTOPHER FEW, has been forwarded to Mr.

Matthew Derbes with the Louisiana Attorney General's Office, via facsimile and US Mail,

this 20th day of April, 2017.


GEORGE LEWIS HIGGINS, III

CRIMINAL DOCKET NUMBER: 190,764-B

DIVISION "B"

12TH JUDICIAL DISTRICT COURT

PARISH OF AVOYELLES

STATE OF LOUISIANA

VERSUS

NORRIS GREENHOUSE, JR.

FILED: _____ : _____ DY.CLK.

ORDER

The above and foregoing Motion considered:

IT IS ORDERED:

That the State of Louisiana, through the Office of the Attorney General, appear and show cause on the 2nd day of May 2017, at 11 o'clock A.M., why this *NOTICE OF USE OF SELF DEFENSE, JUSTIFICATION AND DEFENSE OF OTHERS AS TO ATTEMPTED MURDER CHARGE OF CHRISTOPHER FEW*, should not be granted.

THUS DONE AND SIGNED at Marksville, Avoyelles Parish, Louisiana, on this _____ day of April, 2017.

JUDGE - 12TH JUDICIAL DISTRICT COURT

CRIMINAL DOCKET NUMBER: 190,764-B

DIVISION "B"

12TH JUDICIAL DISTRICT COURT

PARISH OF AVOYELLES

STATE OF LOUISIANA

VERSUS

NORRIS GREENHOUSE, JR.

FILED: _____ : _____ **DY. CLK.**

**MOTION TO REQUIRE STATE TO REVEAL ANY AGREEMENT ENTERED INTO
BETWEEN THE STATE AND ANY PROSECUTION WITNESS**

NOW INTO COURT, through undersigned counsel, comes Defendant, **NORRIS GREENHOUSE JR.**, who respectfully moves this Honorable Court to issue an order requiring the State of Louisiana, through the Louisiana Attorney General's Office, to specify, list and or reveal any agreement entered into between the Louisiana Attorney General's Office, Avoyelles Parish District Attorney's Office, United States Attorney's Office, Avoyelles Parish Sheriff's Office, St. Landry Parish Sheriff's Office, and or any other law enforcement agency and prosecutorial office with any and all witnesses that could conceivably influence said witnesses' testimony based on the following grounds

1.

The credibility of said witness(es) will be an important issue in the principle case, and the evidence of any understanding or agreements as to future prosecution or any other consideration would be relevant to such witnesses' credibility and the trial jury is entitled to know it.

2.

A refusal to reveal any said agreement constitutes a violation of the due process clause of the Fourteenth Amendment to the United States Constitution.

3.

This motion specifically applies to Christopher Few, Megan Dixon, Jason Brouillette, and

Kenneth Parnell however, agreements made with any and all witnesses involved should be revealed.

4.

The Louisiana Attorney General's Office cannot sit idly by and state that they are not aware of any agreement. It is the State's constitutional duty to investigate and ferret out any and all possible agreements, both real and conceived, and or any favors as specified by *Kyles v. Whitley*, 514 U.S. 419, 115 S.Ct. 1555, 131 L.Ed.2d 490 (1995) and *Giglio v U.S.*, 405 U.S. 150, 92 S.Ct. 763, 31 L.Ed.2d 104 (1972)

RESPECTFULLY SUBMITTED:

HIGGINS LAW OFFICE

BY: 

GEORGE L. HIGGINS, III

Louisiana Bar Rolt No: 06872

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Pineville, Louisiana 71361-3370

(318) 473-4250

**ATTORNEY FOR DEFENDANT,
NORRIS GREENHOUSE JR.**

CERTIFICATE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing

Motion to Require State to Reveal Any Agreement Entered Into Between the State and Any

Prosecution Witness, has been forwarded to Mr. Matthew Derbes with the Louisiana Attorney

General's Office, via facsimile and US Mail, this 2nd day of April, 2017.


GEORGE LEWIS HIGGINS, III

CRIMINAL DOCKET NUMBER: 190,764-B

DIVISION "B"

12TH JUDICIAL DISTRICT COURT

PARISH OF AVOYELLES

STATE OF LOUISIANA

VERSUS

NORRIS GREENHOUSE, JR.

FILED: _____ ; _____ DY.CLK.

ORDER

The above and foregoing Motion considered:

IT IS ORDERED:

That the State of Louisiana, through the Office of the Attorney General, appear and show cause on the 2nd day of May, 2017, at 11 o'clock A.M., why this Motion to Require State to Reveal Any Agreement Entered Into Between the State and Any Prosecution Witness should not be granted.

THUS DONE AND SIGNED at Marksville, Avoyelles Parish, Louisiana, on this _____ day of April, 2017.

JUDGE - 12TH JUDICIAL DISTRICT COURT

CRIMINAL DOCKET NUMBER: 190,764-B

DIVISION "B"

12TH JUDICIAL DISTRICT COURT

PARISH OF AVOYELLES

STATE OF LOUISIANA

VERSUS

NORRIS GREENHOUSE, JR.

FILED: _____ ; _____ DY.CLK.

MOTION TO HAVE JURY VIEW SCENE

NOW INTO COURT, through undersigned counsel, comes Defendant, **NORRIS GREENHOUSE JR.**, who respectfully moves this Honorable Court to allow the jury to view the crime scene located at Martin Luther King Drive and Taensas Street in Avoyelles Parish, Louisiana, such views to constitute an evidentiary view, and shows the Court the following facts:

1.

Defendant, NORRIS GREENHOUSE JR, is charged with and indicted for (1) count 2nd degree murder and (1) count attempted 2nd degree murder.

2.

Defendant, NORRIS GREENHOUSE JR, is presently being tried on the above-referenced case and if found guilty could be sentenced to life in prison.

3.

Through the testimony of a number of witnesses, the State has sought to illustrate the relative position of NORRIS GREENHOUSE JR during the shooting.

4.

In the State's case-in-chief, photographs of the crime scene located at Martin Luther King

Drive at Taensas Street have been identified and introduced into evidence.

5.

In the State's case-in-chief, a model of the crime scene located at Martin Luther King Drive and Texas Street have been identified and introduced into evidence.

6.

An evidentiary view of the crime scene would permit the jury to view evidence introduced in the case, which evidence is so large and affixed that it cannot be brought into the courtroom.

7.

The jury's understanding of the layout of the crime scene is vitally important to allow them to critically evaluate witness testimony.

8.

The jury should be allowed to apply to the witness testimony the knowledge obtained by them seeing the crime scene located at Martin Luther King Drive and Taensas Street and to use their knowledge in construing the evidence.

9.

There is no likelihood that prejudice would inure to the cause of the State or Defendant if the evidentiary view is granted.

10.

The authority to grant an evidentiary jury view is within the discretion of the trial court.

11.

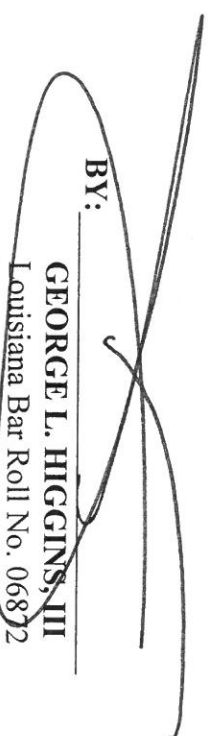
Cautionary instructions to the jury should be given prior to their being allowed to view the crime scene, such instructions to be determined by the Court following conference with counsel for the State and defense.

12.

The jurors should be accompanied to the view by the sheriff and the view should be conducted in the presence of the Court, court reporter, counsel, and defendant.

WHEREFORE, the Defendant, **NORRIS GREENHOUSE, JR.**, respectfully request that the Court grant an evidentiary view of the crime scene located at Martin Luther King Drive and Taensas Street.

RESPECTFULLY SUBMITTED:
HIGGINS LAW OFFICE

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Louisiana Bar Roll No. 06872
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Pineville, Louisiana 71361-3370
(318) 473-4250
ATTORNEY FOR DEFENDANT,
NORRIS GREENHOUSE JR.

CERTIFICATE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing Motion to Have Jury View the Scene, has been forwarded to Mr. Matthew Derbes with the Louisiana Attorney General's Office, via facsimile and US Mail, this 20th day of April, 2017.


GEORGE LEWIS HIGGINS, III

CRIMINAL DOCKET NUMBER: 190,764-B

DIVISION "B"

12TH JUDICIAL DISTRICT COURT

PARISH OF AVOYELLES

STATE OF LOUISIANA

VERSUS

NORRIS GREENHOUSE, JR.

FILED: _____ : _____ DY.CLK.

ORDER

The above and foregoing Motion considered:

IT IS ORDERED:

That the State of Louisiana, through the Office of the Attorney General, appear and show cause on the 2nd day of May 2017, at 11 o'clock A.M., why this Motion to Have Jury View the Scene should not be granted.

THUS DONE AND SIGNED at Marksville, Avoyelles Parish, Louisiana, on this _____ day of April, 2017.

JUDGE - 12TH JUDICIAL DISTRICT COURT