

Anne Taylor Law, PLLC
Anne C. Taylor, Attorney at Law
PO Box 2347
Coeur d'Alene, Idaho 83816
Phone: (208) 512-9611
iCourt Email: info@annetaylorlaw.com

Elisa G. Massoth, PLLC
Attorney at Law
P.O. Box 1003
Payette, Idaho 83661
Phone: (208) 642-3797; Fax: (208)642-3799

Bicka Barlow
Pro Hac Vice
2358 Market Street
San Francisco, CA 94114
Phone: (415) 553-4110

Assigned Attorney:

Anne C. Taylor, Attorney at Law, Bar Number: 5836
Elisa G. Massoth, Attorney at Law, Bar Number: 5647
Bicka Barlow, Attorney at Law, CA Bar Number: 178723
Jay W. Logsdon, First District Public Defender, Bar Number: 8759

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

STATE OF IDAHO,

Plaintiff,

V.

BRYAN C. KOHBERGER,

Defendant.

CASE NUMBER CR01-24-31665

MOTION IN LIMINE #4

**RE: USING THE TERMS
PSYCHOPATH OR SOCIOPATH**

COMES NOW, Bryan C. Kohberger, by and through his attorneys of record, and hereby moves the Court for an Order prohibiting the state from name calling. Specifically, this motion seeks to bar the use of the terms “psychopath” and “sociopath”.

This motion is made pursuant to I.C.R. 47, I.R.E. 403,701-704, the Fifth, Sixth and Fourteenth Amendments to the United States Constitution and Article I, Section 13 of the Idaho Constitution.

I.R.E. 403 allows exclusion of evidence that is unfairly prejudicial to a party. By analogy the same principle should apply to terminology that is unfairly prejudicial. The use of the word “psychopath” or “sociopath” during the course of the trial is unfairly prejudicial. See attached affidavit of Dr. John Edens¹.

This is improper opinion testimony under I.R.E. 701-704. Neither term is a proper diagnosis and is unequivocally unfairly prejudicial. Mr. Kohberger requests an order prohibiting the lawyers and witnesses from using the words “psychopath,” and “sociopath”.

DATED this 24 day of February, 2025.



BY:

ANNE C. TAYLOR
ANNE TAYLOR LAW, PLLC

CERTIFICATE OF DELIVERY

I hereby certify that a true and correct copy of the foregoing was personally served as indicated below on the 24 day of February, 2025 addressed to:

Latah County Prosecuting Attorney –via Email: paservice@latahcountyid.gov

Elisa Massoth – via Email: legalassistant@kmrs.net

Jay Logsdon – via Email: Jay.Logsdon@spd.idaho.gov

Bicka Barlow, Attorney at Law – via Email: bickabarlow@sbcglobal.net

Jeffery Nye, Deputy Attorney General – via Email: Jeff.nye@ag.idaho.gov



¹ Motion in Limine #4 Exhibit 1 - Affidavit of John Edens