

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA**

**MAUREEN TOFFOLONI,** )  
as Administrator and Personal )  
Representative of the ESTATE )  
OF NANCY E. BENOIT, )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
**LFP PUBLISHING GROUP, LLC,** )  
d/b/a Hustler Magazine. )  
 )  
Defendant. )

CASE NO. 1:08-cv-00421-TWT

**DEFENDANT’S SUPPLEMENTAL OBJECTIONS TO PLAINTIFF’S  
EXHIBIT LIST**

Per the Court’s direction, Defendant LFP Publishing Group, LLC hereby respectfully submits this supplemental objection to Plaintiff’s list of documentary and physical evidence identified at Attachment G-1 to the Pretrial Order [D.I. 176].

Defendant objects to Plaintiff’s exhibits 5, 7, 8, 9, 10, 11, 12, 13, 14 and 15 on the grounds that each is irrelevant and immaterial to any issue in the first phase of this case, and any probative value such information could possibly have is clearly outweighed by the unfair prejudice the evidence would cause against Defendant and the likelihood of jury confusion regarding what evidence is relevant to the legal measure of damages in this case. Fed. R. Evid. 402 & 403.

[Signature on following page]

Respectfully submitted this 13th day of June 2011.

/s/ S. Derek Bauer

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**CERTIFICATE OF SERVICE**

This is to certify that I have this day filed the within and foregoing SUPPLEMENTAL OBJECTIONS TO PLAINTIFF'S EXHIBIT LIST via the CM/ECF system which will automatically send notification to Plaintiff's attorneys of record, who are participants in the CM/ECF system.

This 13<sup>th</sup> day of June 2011.

/s/ S. Derek Bauer

S. Derek Bauer