

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

Case Type: Criminal

State of Minnesota,

Plaintiff,

**STATE'S NOTICE OF MOTION  
AND MOTION FOR JOINDER**

vs.

State v. Derek Michael Chauvin,

Court File No. 27-CR-20-12646

State v. J Alexander Kueng,

Court File No. 27-CR-20-12953

State v. Thomas Kiernan Lane,

Court File No. 27-CR-20-12951

State of Minnesota v. Tou Thao,

Court File No. 27-CR-20-12949

Defendants.

TO: The Honorable Peter Cahill, Judge of District Court, and counsel for Defendants; Eric J. Nelson, Halberg Criminal Defense, 7900 Xerxes Avenue South, Suite 1700, Bloomington, MN 55431; Robert Paule, 920 Second Avenue South, Suite 975, Minneapolis, MN 55402; Earl Gray, 1<sup>st</sup> Bank Building, 332 Minnesota Street, Suite W1610, St. Paul, MN 55101; Thomas Plunkett, U.S. Bank Center, 101 East Fifth Street, Suite 1500, St. Paul, MN 55101.

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that on September 11, 2020, at 9:00 a.m., or as soon thereafter as counsel may be heard, the State will move the Court as follows:

**MOTION**

For an Order joining the above-captioned matters for trial. This motion is based on Minn. R. Crim. P. 17.03, the accompanying Memorandum of Law and Affidavit of Matthew Frank, and all the files, records, and proceedings herein.

Dated: August 12, 2020

Respectfully submitted,

KEITH ELLISON  
Attorney General  
State of Minnesota

/s/ Matthew Frank  
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