

STATE OF MINNESOTA
COUNTY OF HENNEPIN

DISTRICT COURT
FOURTH JUDICIAL DISTRICT

STATE OF MINNESOTA,

**JOINT MOTION TO
CONTINUE TRIAL DATE**

PLAINTIFF,

V.

TOU THAO,

COURT FILE NO.: 27-CR-20-12949

J. ALEXANDER KUENG,

COURT FILE NO.: 27-CR-20-12953

THOMAS KIERNAN LANE,

COURT FILE NO.: 27-CR-20-12951

DEFENDANT.

TO: THE HONORABLE PETER A. CAHILL, JUDGE OF DISTRICT COURT.

MOTION

Comes now the undersigned, the attorneys for the State of Minnesota and the attorneys for the above-named defendants, respectfully requesting an order granting this joint request to continue the trial date in the above-entitled matter. The basis for this request is that the above-named defendants are charged by indictment in federal court with a trial scheduled to begin on January 20, 2022, and it is not known how long that trial will last. The undersigned are all in agreement that a continuance should be granted in the interest of justice.

The parties also request that the court hold an informal scheduling conference to discuss a new trial date and any necessary litigation deadlines.

Dated: This 7th day of January, 2022

Respectfully submitted,

/s/ Matthew Frank

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