

STATE OF MINNESOTA
COUNTY OF KANDIYOHI

IN THE DISTRICT COURT
FIFTH JUDICIAL DISTRICT

State of Minnesota,
Plaintiff,

COURT FILE NO. 42-CR-08-220

vs.

**DEFENDANT'S NOTICE OF MOTION AND
MOTION FOR ORDER ALLOWING FOR
DEPOSITIONS**

Olga Marina Franco, aka
Alianiss Nunez Morales

Defendant.

TO: THE DISTRICT COURT ADMINISTRATOR OF LYON COUNTY, RICK MAES,
LYON COUNTY ATTORNEY, AND HONORABLE DAVID W. PETERSON, 607 W.
Main St., Marshall, MN 56258:

PLEASE TAKE NOTICE that the Defendant will move at the
Hearing to be held on MAY 15, 2008 at 10:00 a.m., or as soon as
thereafter may be heard on A motion and court order to allow her
to schedule a deposition in order to preserve the testimony of
Keryn Vigil, James A. Blodgett, Fabian Marcial.

This motion is made pursuant to Rule 10.01 and 21 of the
Minnesota Rules of Criminal Procedure and the U.S. and Minnesota
Constitutions Due Process Clauses and the right to fully prepare
a defense to the criminal charges herein.

You are informed that responsive pleadings shall be served
and mailed to or filed with the Lyon County Court Administrator

FILED IN THIS OFFICE

5-6-08

Karen J. Bierman
COURT ADMINISTRATOR
Marshall, Lyon County, Minnesota

no later than three (3) days prior to the scheduled hearing or
the court may disregard any responsive pleadings served or filed
less than three (3) days prior to the above hearing.

Dated: May 3, 2008



Manuel P. Guerrero, Esq.

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651 224 4855

Co-counsel for Defendant