STATE OF MINNESOTA

COUNTY OF LYON

DISTRICT COURT

FIFTH JUDICIAL DISTRICT

CRIMINAL COURT DIVISION
Court File No. 42-CR-08-220

State of Minnesota,

Plaintiff,

vs.

Olga Marina Franco del Cid
Aka
Alianiss Nunez Morales,

Defendant.

DEFENDANT'S NOTICE OF MOTION AND MOTION FOR AN ADVANCE COPY Of COMPLETED JURY POOL QUESTIONNAIRE PRIOR TO THE DAY OF TRIAL

To: Lyon County District Court, Criminal Division, Lyon County Government Center, 607 West Main Street, Marshall, MN 56258;

and: Lyon County Attorney's Office, Attention: Rick Maes, Lyon County Attorney, 607 West Main Street, MN 56258.

NOTICE OF MOTION

YOU WILL PLEASE TAKE NOTICE that the Defendant, by and through her attorney, Manuel P. Guerrero, will move this honorable court for an order to allow the defense to obtain for review and trial preparation a copy of the jury pool questionnaires well in advance of the day of trial.

The hearing is now scheduled for **Tuesday, July 8, 2008** at 9:00 a.m. or as soon thereafter as counsel may be heard, at the Lyon County Government Center, located at 607 West Main Street, Marshall, MN 56258.

FILED IN THIS OFFICE
6-27-08
Karen J. Bierman
COURT ADMINISTRATOR
Marshall, Lyon County, Minnesota

MOTION

COMES NOW the Defendant, by and through her attorney, Manuel P. Guerrero, and hereby requests an Order from this honorable court to allow the defense to obtain for review and trial preparation a copy of the jury pool questionnaires well in advance of the day of trial.

This Motion is made pursuant to:

1. Rule 10.01; 10.04; and 11.04 of the Minnesota Rules of Criminal Procedure;

2. Due Process under the United States Constitution and the Minnesota State Constitution;

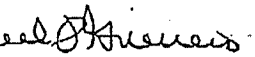
3. Defendant's right to a fair trial and the opportunity to prepare, including proper preparation for jury selection.

This Motion is based upon all the court files and records in the above entitled matter.

You are informed that responsive pleadings shall be served and mailed to or filed with the Court Administrator no later than three days prior to the scheduled hearing. The court may, in its discretion disregard any responsive pleadings served or filed less than three days prior to the hearing.

Dated: 23 June, 2008

RESPECTFULLY SUBMITTED,



Manuel P. Guerrero (38520)
Attorney for Defendant
148 Farrington Street
St. Paul, MN 55102
(651) 587-2158