

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

Court File No. 27-CR-20-12646

State of Minnesota,

Plaintiff,

vs.

Derek Michael Chauvin,

Defendant.

**DEFENDANT'S MOTION
FOR ATTORNEY'S FEES
PURSUANT TO
MINN. R. CRIM. P. 28.04, SUBD. 2(6)**

**TO: THE ABOVE-NAMED COURT; AND THE HONORABLE PETER A. CAHILL,
JUDGE OF HENNEPIN COUNTY DISTRICT COURT.**

NOTICE OF MOTION

PLEASE TAKE NOTICE that the Defendant, Derek Michael Chauvin, through his attorney Eric J. Nelson, Halberg Criminal Defense, hereby moves this Court for the following relief:

MOTION

1. For an order granting reasonable attorney's fees, pursuant to Minn. R. Crim. P. 28.04, subd. 2(6) and Minn. Stat. § 611.27, subd. 16. On January 28, 2021, the State brought a pretrial appeal from this Court's January 11, 2021, Order denying the State's motion to reconsider. On January 30, 2021, undersigned counsel filed a motion to dismiss the appeal, which was assigned case no. A21-0133, and began to prepare a brief in response to State's brief, which was filed on January 29, 2021. On February 3, 2021, the court of appeals consolidated Mr. Chauvin's case with those of his codefendants and ordered the case expedited. On February 12, 2021, the court of appeals dismissed the State's interlocutory appeal in A21-0133, and the matter proceeded to trial. On April 20, 2021, a jury convicted Mr. Chauvin of second-degree, unintentional murder. On June 25, 2021, this Court committed Mr. Chauvin to the

