

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

State of Minnesota,

Vs. Plaintiff,

Mohamed Mohamed Noor,

Defendant.

**DEFENDANT'S NOTICE OF MOTION
AND MOTION FOR MITIGATED
SENTENCING DEPARTURE**

Court File No.: 27-CR-18-6859

NOTICE OF MOTION AND MOTION

Please take notice that on June 7, 2019 at 9:00 AM or as soon thereafter as Counsel may be heard, the defendant, Mohamed M. Noor, will move this Court for a mitigated dispositional departure. In the alternative Mr. Noor will moves this Court for a mitigated durational departure. The Grounds for the dispositional departure are his particular amenability to probation, cooperation, attitude in court and remorse. Alternatively, the grounds for a mitigated durational departure are the less onerous nature of the offense.

This motion is based on Minn. R. Crim. P. 27.03; the forthcoming Pre-Sentence Investigation Report; forthcoming memorandum of law in support of motion with exhibits, the Court's file, the entire record, and any oral arguments the Court may permit.

Respectfully submitted,

Dated: May 30, 2019

s/ Thomas C. Plunkett
Thomas C. Plunkett
Attorney No. 260162
Attorneys for Defendant
Suite 1500

101 East Fifth Street
St. Paul, MN 55101
Phone: (651) 222-4357

s/ Peter B. Wold
Peter B. Wold, ID #118382
Wold Morrison Law
247 Third Avenue South
Minneapolis, MN 55415
Phone: 612-341-2525
Fax: 612-341-0116