

STATE OF MINNESOTA
COUNTY OF HENNEPIN

DISTRICT COURT
FOURTH JUDICIAL DISTRICT

STATE OF MINNESOTA,

DEFENDANT'S
MOTIONS IN LIMINE

PLAINTIFF,

V.

TOU THAO,

DEFENDANT.

COURT FILE NO. 27-CR-20-12949

TO: THE HONORABLE PETER A. CAHILL, JUDGE OF DISTRICT COURT, AND
MR. MATTHEW G. FRANK, ASSISTANT ATTORNEY GENERAL

NOTICE OF MOTION

Please take notice, that on March 5, 2021 or as soon thereafter as counsel may be heard,
Tou Thao (“Mr. Thao” herein) will move the Court as follows.

MOTION

Mr. Thao respectfully moves the Court for the following:

1. An order prohibiting the State from referring to George Floyd as a “victim” in this case, as this is a characterization of evidence. Mr. Thao requests the Court to direct the State to refer to George Floyd by his name or as “the decedent”.
2. An order precluding any spark of life testimony of George Floyd, except within precedential limitations.

3. An order directing the State to disclose complete criminal histories – specifically N.C.I.C. records – of listed witnesses, including law enforcement officers.
4. An order directing the State to disclose all personnel and disciplinary files on all law enforcement officers listed as potential witnesses by the State.
5. An order requiring the State to allow the defense access to and use of video/audio exhibits and equipment introduced and utilized by the State.
6. An order requiring the State to identify the witness(es) it intends to call by 6:00 p.m. the day prior to anticipated testimony.
7. An order directing the State to disclose or otherwise assist in the disclosure of the National Prosecutors College and the National District Attorneys Association database/materials pertaining to all experts (both State and defense) prior to the start of trial.
8. An order directing the State to disclose or assist in the disclosure of Minneapolis Fire Department personnel records of Genevieve Hanson.
9. An order directing the State to disclose or assist in the disclosure of all Minneapolis Police Department personnel, training, or hiring records of Donald Williams.
10. An order directing the State to disclose or assist in the disclosure of a recording and transcript of the interview of Dr. Baker by FBI and BCA agents on July 8, 2020.
11. An order directing the State to disclose the entire email exchange between the United States Attorneys Office and the Hennepin County Attorneys Office staff involved in the representation of Dr. Baker from the dates of July 1, 2020 to October 28, 2020.
12. An order directing the State to refer to counsel either by name or by “counsel” when on the record. The use of phrases and terms such as “my friends” is not appropriate under Minnesota rules.

13. An order directing the State to disclose all chain of custody and search evidence of Mr. Floyd's vehicle from May 25, 2020 to present.
14. An order directing the State to disclose all chain of custody evidence of Mr. Floyd's body from May 25, 2020 to burial.

Dated: This 8th day of February, 2021

/s/ Robert M. Paule
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