

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

STATE OF MINNESOTA,**MOTION FOR LEAVE TO SUPPLEMENT THE
SPREIGL MOTION WITH AN ADDITIONAL
MOTION WITH AN ADDITIONAL VIDEO
EXHIBIT**

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**MOTION**

Tou Thao, defendant herein, respectfully moves the court for leave to supplement his Motion to Admit Speigl Evidence with an additional video exhibit, specifically, Mr. Thao request leave to file a video exhibit of the body worn camera footage of Mr. Floyd being questioned by arresting officers on May 6, 2019. The purpose of this exhibit is, in relevant part, to visually demonstrate Mr. Floyd's physical symptoms of reaction to drug ingestion that are not readily apparent from either the police reports or the transcript of this activity. Additionally, there are discrepancies between the previously submitted transcript and the video sought to be admitted that are relevant to Mr. Thao's specific and individual theory.

As verbally ordered by the court on October 15, 2020, Mr. Thao will not supplement this motion with the proposed video exhibit.

Respectfully submitted,

Dated: This 16th day of October, 2020

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