

STATE OF MINNESOTA
COUNTY OF HENNEPIN

DISTRICT COURT
FOURTH JUDICIAL DISTRICT

STATE OF MINNESOTA,

**NOTICE OF MOTION AND MOTION TO
FIND KEITH ELLISON IN CONTEMPT OF
COURT AND FINDINGS OF SANCTIONS**

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 at a date to be scheduled before the court, Tou Thao (“Defendant” herein) will move the Court for an order holding the Attorney General’s Office – specifically Keith Ellison – in contempt of court for it’s violation of the Court’s July 9, 2020 Gag Order.

MOTION

Defendant, by and through counsel, respectfully moves the Court for an order holding Keith Ellison, the Attorney General for Minnesota and lead prosecutor in the above-captioned case, in contempt of court and ordering sanctions as a result of his actions.

Respectfully submitted,

Dated: This 14th day of July, 2020

/s/ Robert M. Paule
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