

STATE OF MINNESOTA

DISTRICT COURT

HENNEPIN COUNTY

FOURTH JUDICIAL DISTRICT

Court File No. 27-CR-20-12951

Court File No. 27-CR-20-12953

Court File No. 27-CR-20-12949

State of Minnesota,

Plaintiff,

v.

DISCOVERY MOTION -
BRADY GIGGLIOThomas Kiernan Lane,
J. Alexander Kueng,
Tou Thao,Defendants.

Thomas Kiernan Lane, through his counsel, Earl Gray, moves the Court for an order directing the State to produce and disclose all use of force arrest reports where force was used by a Minneapolis police officer in making an arrest and another officer, either orally or physically, intervened in the use of force by his or her fellow police officer, in the last fifty years.

This motion is based upon Brady v. Maryland, 373 U.S. 83 (1963); Gigglio v. United States, 405 U.S. 150 (1972), the attached memorandum and all of the files and records herein.

Dated this 10th day of February, 2021.

Respectfully submitted,

s/Earl P. Gray
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