

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

State of Minnesota,

Court File No.: 27-CR-20-12951

Plaintiff,

v.

DEFENDANT'S NOTICE OF MOTION
AND MOTION TO CHANGE VENUE

Thomas Kiernan Lane,

Defendant.

NOTICE OF MOTION

PLEASE TAKE NOTICE that on or about September 11, 2020 at 9:00 a.m., the defendant, Thomas Lane, through his counsel, Earl Gray, will move the Court for the following relief:

MOTION

For an order granting change in the place of trial from Hennepin County, Minnesota, to Washington or Dakota County. Obviously, based on the historic events, an impartial trial cannot be had in Hennepin County.

This motion is based upon the Fifth, Sixth and Fourteenth Amendments to the United States and Minnesota Constitutions, Minnesota Rules of Criminal Procedure, the Minnesota Statutes and case law.

Respectfully Submitted,

s/ Earl Gray

SEPTEMBER 8, 2020

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