

STATE OF MINNESOTA  
COUNTY OF HENNEPIN

DISTRICT COURT  
FOURTH JUDICIAL DISTRICT

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State of Minnesota,

Court File No. 27-CR-20-12951

Plaintiff,

v.

**NOTICE OF MOTION AND  
MOTION TO DISMISS**

Thomas Kiernan Lane,

Defendant.

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**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 an Order dismissing the charges in the complaint for lack of probable cause based on the entire record. The Defendant further moves for a *Florence* hearing to submit the following documents as Exhibits (attached to Memorandum) in support of the Motion to Dismiss:

1. Transcript of Thomas Lane Interview (EXHIBIT 1)
2. Transcript of Thomas Lane body worn camera (BWC) (EXHIBIT 2)
3. BWC footage of Thomas Lane (EXHIBIT 3)
4. Transcript of Alexander Kueng BWC (EXHIBIT 4)
5. BWC footage of Alexander Kueng (EXHIBIT 5)
6. Pictures of money in vehicle (EXHIBIT 6)
7. Training materials (EXHIBIT 7)
8. Lombardo; Gilbert v. City of St. Louis, et. al., 956 F.3d 1009 (8<sup>th</sup> Cir. 2020) (Exhibit 8)

This motion is based upon all of the records and files herein, and the memorandum submitted.

Dated this 7<sup>th</sup> day of July, 2020

Respectfully Submitted,

s/ Earl Gray

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