## STATE OF MINNESOTA

HENNEPIN COUNTY

State of Minnesota,

Plaintiff,

vs.

Mohamed Noor,

Defendant.

## DISTRICT COURT

FOURTH JUDICIAL DISTRICT

File No. 27-CR-18-6859 The Honorable Kathryn L. Quaintance

## NOTICE OF MOTION AND MOTION OF MEDIA COALITION OBJECTING TO ORDERS THAT INTERFERE WITH FIRST AMENDMENT NEWSGATHERING AND REPORTING ACTIVITIES

TO: The Honorable Kathryn L. Quaintance, Fourth Judicial District Court Judge; Amy E. Sweasy and Patrick R. Lofton, Assistant Hennepin County Attorneys, attorneys for State of Minnesota; and Thomas C. Plunkett and Peter B. Wold, attorneys for Defendant Mohamed Noor

PLEASE TAKE NOTICE that Star Tribune Media Company LLC, CBS Broadcasting Inc., Minnesota Public Radio, TEGNA Inc., and Fox/UTV Holdings, LLC (collectively, the "Media Coalition") make the following motion, objecting to any order, oral or written, which (1) constitutes a *de facto* closure of the courtroom by virtue of permitting certain evidence including, but not limited to, video footage and photographs—to be viewed only by the jury and other trial participants and not by the press and public and (2) bars the courtroom sketch artist from depicting trial participants or otherwise bars members of the press from reporting on what transpires during the trial and/or on statements trial participants make outside the courtroom. This motion is based upon a contemporaneously filed memorandum, the affidavit of Leita Walker and the exhibits attached thereto, and all the files, records, and proceedings herein.

This motion will be heard at a time and place to be determined by the Court.

Dated: April 2, 2019

## **BALLARD SPAHR LLP**

s/ Leita Walker

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