STATE OF MINNESOTA	DISTRICT COURT
COUNTY OF HENNEPIN	FOURTH JUDICIAL DISTRICT

State of Minnesota,

                 Plaintiff,

vs.

Derek Michael Chauvin,

                 Defendant.

Court File No. 27-CR-20-12646

DEFENDANT'S NOTICE OF MOTIONS AND MOTIONS TO CHANGE VENUE AND RESERVE RULING

TO: THE HONORABLE PETER A. CAHILL, JUDGE OF HENNEPIN COUNTY DISTRICT COURT; AND MATTHEW G. FRANK, ASSISTANT MINNESOTA ATTORNEY GENERAL.

NOTICE OF MOTIONS

PLEASE TAKE NOTICE that on September 11, 2020, or as soon as this matter can be heard, the Defendant, Derek Michael Chauvin, through his attorney Eric J. Nelson, Halberg Criminal Defense, will move this Court for the following relief:

MOTIONS

1. For an order granting a change of venue, pursuant to Minn. R. Crim. P. 24.03 and 25.02, because of the excessive amount of pretrial publicity surrounding this case in the Twin Cities Metropolitan Area, particularly in Hennepin and Ramsey Counties, where protests over George Floyd's death, riots and looting were televised internationally, and near-nonstop on local media, for several days such that the Twin Cities jury pools have surely been tainted and a fair trial cannot be had in the Twin Cities area.

2. For an order reserving this Court's ruling on Mr. Chauvin's motion to change venue until after the State's motion for joinder has been decided. Defendant further requests that a

briefing schedule not be set for his change of venue motion until after the State's joined

motion has been decided.

3. Any other relief deemed fair and equitable by the Court.

This motion is based upon the files and records in this case, the Minnesota Statutes, the

Minnesota Rules of Criminal Procedure, the United States and Minnesota Constitutions and upon

such other and further points and authorities as may subsequently be presented to the Court.

Respectfully submitted,

HALBERG CRIMINAL DEFENSE

Dated: August 28, 2020   /s/ Eric J. Nelson
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