

STATE OF MINNESOTA  
HENNEPIN COUNTY

DISTRICT COURT  
FOURTH JUDICIAL DISTRICT

State of Minnesota

Plaintiff,

The Honorable Peter A. Cahill

vs.

Derek Michael Chauvin  
Tou Thao  
Thomas Kiernan Lane  
J. Alexander Kueng

Dist. Ct. File 27-CR-20-12646  
Dist. Ct. File 27-CR-20-12949  
Dist. Ct. File 27-CR-20-12951  
Dist. Ct. File 27-CR-20-12953

Defendants

**NOTICE OF MOTION AND MOTION  
OF MEDIA COALITION OBJECTING  
TO THE COURT'S  
JULY 9 GAG ORDER**

TO: The Honorable Peter A. Cahill, Fourth Judicial District Court Judge; Matthew Frank, Assistant Attorney General, attorney for State of Minnesota; Earl P. Gray, attorney for Defendant Thomas Kiernan Lane; Eric Nelson, attorney for Derek Chauvin; Thomas C. Plunkett, attorney for J. Alexander Kueng; and Robert Paule, attorney for Tou Thao.

American Public Media Group (which owns Minnesota Public Radio); The Associated Press; Cable News Network, Inc.; CBS Broadcasting Inc. (on behalf of WCCO-TV and CBS News); Court TV Media LLC; Dow Jones & Company (which publishes *The Wall Street Journal*); Fox/UTV Holdings, LLC (which owns KSMP-TV); Hubbard Broadcasting, Inc. (on behalf of its broadcast stations, KSTP-TV, WDIO-DT, KAAL, KOB, WNYT, WHEC-TV, and WTOP-FM); Minnesota Coalition on Government Information; The New York Times Company; The Silha Center for the Study of Media Ethics and Law; TEGNA Inc. (which owns KARE-TV); and Star Tribune Media Company LLC (collectively, the "Media Coalition") make the following motion, objecting to the Court's entry of the July 9 Gag Order. This motion is based upon a contemporaneously filed memorandum, and all the files, records, and proceedings herein.

This motion will be heard at 3:00 p.m. on Tuesday, July 21, 2020, in Courtroom 1856 at Hennepin County Government Center before the Honorable Peter A. Cahill, Judge, Fourth Judicial District Court Judge.

Dated: July 17, 2020

**BALLARD SPAHR LLP**

*s/ Leita Walker*

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