### STATE OF MINNESOTA

COUNTY OF HENNEPIN

STATE OF MINNESOTA,

# DISTRICT COURT

FOURTH JUDICIAL DISTRICT

## NOTICE OF MOTION AND MOTION TO CONTINUE DEADLINES

V.

TOU THAO,

DEFENDANT.

PLAINTIFF,

COURT FILE NO. 27-CR-20-12949

# TO: THE HONORABLE PETER A. CAHILL, JUDGE OF DISTRICT COURT, AND MR. MATTHEW G. FRANK, ASSISTANT ATTORNEY GENERAL

## **NOTICE OF MOTION**

Please take notice, that on March 5, 2021, or as soon thereafter as counsel may be heard,

Tou Thao ("Mr. Thao" herein) will move the Court as follows.

### **MOTION**

Mr. Thao respectfully moves the Court to move the February 8, 2021 deadline to disclose

proposed witness list and jury instructions for the above-captioned case.

On January 11, 2021, this Court continued the trial date of State v. Thao from March 8,

2021 to August 23, 2021. As such, Mr. Thao respectfully moves the Court to continue the deadline

for his witness list and proposed jury instructions from February 8, 2021 to July 26, 2021.

Respectfully submitted,

Dated: This 5<sup>th</sup> day of February, 2021

<u>/s/ Robert M. Paule</u> Robert M. Paule (#203877) Robert M. Paule, P.A. 920 Second Avenue South, Suite 975 Minneapolis, MN 55402 T: (612) 332-1733 F: (612) 332-9951

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