STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

Case Type: Criminal

State of Minnesota,

Plaintiff.

MOTION FOR ADMISSION OF NATHANIEL A.G. ZELINSKY *PRO HAC VICE* AND PROPOSED ORDER

v.

Derek Michael Chauvin,

J. Alexander Keung,

Thomas Kiernan Lane,

Tou Thao,

Court File No.: 27-CR-20-12646

NOTICE OF MOTION AND

Court File No. 27-CR-20-12953

Court File No. 27-CR-20-12951

Court File No. 27-CR-20-12949

Defendants.

I, Matthew Frank, an active member in good standing of the bar of the State of Minnesota, move that this Court admit *pro hac vice*, Nathaniel A.G. Zelinsky, an attorney admitted to practice in the trial courts of Connecticut and Washington, DC, but not admitted to the bar of this Court, who will be co-counsel for the Plaintiff in these cases. I am aware that Rule 5 of the Minnesota General Rules of Practice requires me to (1) sign all pleadings in this case, (2) be present in person or by telephone at the proceeding at the initial hearing in which Mr. Zelinsky appears, and (3) be present in person or by telephone at all subsequent proceedings in these cases unless the Court, in its discretion, conducts the proceedings without the presence of Minnesota counsel.

I declare under penalty of perjury that everything that I have stated in this document is true and correct. Minn. Stat. § 358.116.

This motion is made pursuant to Minn. R. Gen. Prac. 5 and is based on the attached Affidavit of Nathaniel A.G. Zelinsky and on all the files, records and proceedings herein. Counsel does not believe that a hearing on this motion is required or necessary.

Dated: March 17, 2021 Respectfully submitted,

KEITH ELLISON Attorney General State of Minnesota

/s/ Matthew Frank

MATTHEW FRANK Assistant Attorney General Atty. Reg. No. 021940X

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ATTORNEYS FOR PLAINTIFF