STATE OF MINNESOTA DISTRICT COURT

HENNEPIN COUNTY FOURTH JUDICIAL DISTRICT

State of Minnesota Dist. Ct. File 27-CR-20-12951

Plaintiff. The Honorable Peter A. Cahill

VS.

Thomas Kiernan Lane NOTICE OF MOTION AND MOTION

Defendant OF MEDIA COALITION OBJECTING
TO LIMITS ON ACCESS TO BODY-

WORN CAMERA FOOTAGE

PUBLICLY FILED BY DEFENDANT

IN SUPPORT OF HIS DISPOSITIVE

MOTION

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.

PLEASE TAKE NOTICE that American Public Media Group (which owns Minnesota Public Radio); The Associated Press; Cable News Network, Inc.; CBS Broadcasting Inc. (on behalf of WCCO-TV); 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 limits on access to body-worn camera footage publicly filed by Defendant in support of his dispositive motion. 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 before the Honorable Peter A. Cahill, Judge, Fourth Judicial District Court Judge.

Dated: July 13, 2020 BALLARD SPAHR LLP

s/ Leita Walker

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