STATE OF MINNESOTA DISTRICT COURT

HENNEPIN COUNTY FOURTH JUDICIAL DISTRICT

State of Minnesota

Plaintiff, The Honorable Regina M. Chu

VS.

Kimberly Ann Potter Dist. Ct. File 27-CR-21-7460

Defendant

NOTICE OF MOTION AND MOTION OF MEDIA COALITION TO UNSEAL JUROR IDENTITIES AND OTHER JUROR MATERIALS

TO: The Honorable Regina M. Chu, Fourth Judicial District Court Judge; Matthew Frank, Assistant Attorney General, attorney for State of Minnesota; Raoul Shah, Assistant Hennepin County Attorney; Earl Gray and Paul Engh, attorneys for Kimberly A. Potter.

American Public Media Group (which owns Minnesota Public Radio); Association of Minnesota Public Educational Radio Stations; The Associated Press; Cable News Network, Inc.; CBS Broadcasting Inc. (on behalf of WCCO-TV and CBS News); Court TV Media LLC; Fox/UTV Holdings, LLC (which owns KMSP-TV); Gannett Satellite Information Network, LLC (which publishes *USA Today*); 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; Minnesota Spokesman-Recorder; NBCUniversal Media, LLC; Sahan Journal; Saint Paul Pioneer Press; The Silha Center for the Study of Media Ethics and Law; Star Tribune Media Company LLC; TEGNA Inc. (which owns KARE-TV); and WP Company LLC (which publishes *The Washington Post*) (collectively, the "Media Coalition") make the following motion seeking to unseal juror identities and other juror information, including the prospective juror list, juror profiles, juror questionnaires and the original verdict

forms. This motion is based upon a contemporaneously filed memorandum, and all the files, records, and proceedings herein.

This motion will be heard at a time and date that is mutually agreeable to the Media Coalition and the parties before the Honorable Regina M. Chu, Judge, Fourth Judicial District Court Judge.

Dated: January 21, 2022

## **BALLARD SPAHR LLP**

s/ Leita Walker

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