

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

Case Type: Criminal

State of Minnesota,

Plaintiff,

vs.

Derek Michael Chauvin,

J. Alexander Kueng,

Thomas Kiernan Lane,

Tou Thao,

Defendants.

**STATE'S MOTION TO AMEND
DECEMBER 17 SCHEDULING
ORDER ON EXPERT DISCLOSURES**

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

Court File No.: 27-CR-20-12953

Court File No.: 27-CR-20-12951

Court File No.: 27-CR-20-12949

TO: The Honorable Peter A. Cahill, Judge of District Court, and counsel for Defendants, Eric J. Nelson, Halberg Criminal Defense, 7900 Xerxes Avenue South, Suite 1700, Bloomington, MN 55431; Robert Paule, 920 Second Avenue South, Suite 975, Minneapolis, MN 55402; Earl Gray, 1st Bank Building, 332 Minnesota Street, Suite W1610, St. Paul, MN 55101; Thomas Plunkett, U.S. Bank Center, 101 East Fifth Street, Suite 1500, St. Paul, MN 55101.

Please take notice that as soon as counsel can be heard, the State will move the Court for an Order as follows:

1. Amending the December 17, 2020 Scheduling Order to set a deadline for all parties' expert reports of February 1, 2021, or, in the alternative a contemporaneous deadline for all parties' expert reports of February 8, 2021.
2. Amending the December 17, 2020 Scheduling Order to set a deadline for expert rebuttal reports of February 19, 2021 and extending the deadline for motions in limine regarding expert reports and testimony to February 26, 2021.

3. Amending Paragraph C of the December 17, 2020 Scheduling Order to require that each Defendant file a written waiver of their right to be present after consultation with counsel if they elect to not appear at the January 11, 2021 hearing.

Dated: December 24, 2020 Respectfully submitted,

KEITH ELLISON
Attorney General
State of Minnesota

/s/ Matthew Frank
MATTHEW FRANK
Assistant Attorney General
Atty. Reg. No. 021940X
445 Minnesota Street, Suite 1400
St. Paul, Minnesota 55101-2131
(651) 757-1448 (Voice)
(651) 297-4348 (Fax)
matthew.frank@ag.state.mn.us

ATTORNEYS FOR PLAINTIFF