

STATE OF MINNESOTA  
COUNTY OF HENNEPIN

DISTRICT COURT  
FOURTH JUDICIAL DISTRICT

STATE OF MINNESOTA,

**JOINT MOTION TO  
CONTINUE TRIAL DATE**

PLAINTIFF,

V.

TOU THAO,

COURT FILE NO.: 27-CR-20-12949

J. ALEXANDER KUENG,

COURT FILE NO.: 27-CR-20-12953

THOMAS KIERNAN LANE,

COURT FILE NO.: 27-CR-20-12951

DEFENDANT.

TO: THE HONORABLE PETER A. CAHILL, JUDGE OF DISTRICT COURT.

**MOTION**

Comes now the undersigned, the attorneys for the State of Minnesota and the attorneys for the above-named defendants, respectfully requesting an order granting this joint request to continue the trial date in the above-entitled matter. The basis for this request is that the above-named defendants are charged by indictment in federal court with a trial scheduled to begin on January 20, 2022, and it is not known how long that trial will last. The undersigned are all in agreement that a continuance should be granted in the interest of justice.

The parties also request that the court hold an informal scheduling conference to discuss a new trial date and any necessary litigation deadlines.

Dated: This 7<sup>th</sup> day of January, 2022

Respectfully submitted,

**/s/ Matthew Frank**

Matthew Frank  
Assistant Attorney General  
Attorney 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

*Attorney for the Prosecution*

**/s/ Robert M. Paule**

Robert M. Paule (#203877)  
Robert M. Paule, P.A.  
920 Second Avenue South  
Suite 975  
Minneapolis, MN 55402  
T: (612) 332-1733

**/s/ Natalie R. Paule**

Natalie R. Paule (#0401590)  
Paule Law P.L.L.C.  
101 East Fifth Street  
Suite 1500  
St. Paul, MN 55101  
T: (612) 440-3404

**/s/ Thomas C. Plunkett**

Thomas C. Plunkett  
Attorney No. 260162  
101 East Fifth Street  
Suite 1500  
St. Paul, MN 55101  
Phone: (651) 222-4357

**/s/ Earl P. Gray**

Earl P. Gray # 37072  
First National Bank Building  
332 Minnesota Street  
Suite W1610  
St. Paul, MN 55101  
651-223-5175

**/s/ Amanda J. Montgomery**

Amanda Montgomery #0393287  
First National Bank Building  
332 Minnesota Street  
Suite W1610  
St. Paul, MN 55101  
651-223-5175

*Attorneys for the Defendants*