

STATE OF MINNESOTA  
HENNEPIN COUNTY

DISTRICT COURT  
FOURTH JUDICIAL DISTRICT

State of Minnesota

Plaintiff,

The Honorable Regina M. Chu

vs.

Kimberly Ann Potter

Defendant

Dist. Ct. File 27-CR-21-7460

**NOTICE OF MOTION AND MOTION  
OF MEDIA COALITION  
OBJECTING TO CLOSURE OF TRIAL  
TO THE PRESS AND PUBLIC**

TO: The Honorable Regina M. Chu, Fourth Judicial District Court Judge; Paul Engh, attorney for Defendant Kimberly Potter; Earl P. Gray, attorney for Defendant Kimberly Potter; Keith Ellison, Attorney General; Matthew Frank, Assistant Attorney General; Raoul Shah, Assistant Hennepin County Attorney

PLEASE TAKE NOTICE that 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 objecting to the closure of the trial of Kimberly A. Potter to the press and the public. 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 place to be determined before the Honorable  
Regina M. Chu, Fourth Judicial District Court Judge.

Dated: October 29, 2021

**BALLARD SPAHR LLP**

*s/ Leita Walker*

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