

STATE OF MINNESOTA  
COUNTY OF HENNEPIN

DISTRICT COURT  
FOURTH JUDICIAL DISTRICT

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

State of Minnesota,

Plaintiff,

v.

**STATE'S AMENDED MOTION  
IN LIMINE 2 AND MOTION TO  
COMPEL DISCOVERY AND A  
HEARING**

Derek Michael Chauvin,

Defendant.

TO: The Honorable Peter Cahill, Judge of District Court, and counsel for Defendant;  
Eric J. Nelson, Halberg Criminal Defense, 7900 Xerxes Avenue South, Suite 1700,  
Bloomington, MN 55431.

**NOTICE OF MOTIONS**

PLEASE TAKE NOTICE that on March 8, 2021, or as soon thereafter as counsel may be heard, the State of Minnesota will bring the following motions as amendments to the State's Motion In Limine 2 filed on February 8, 2021:

1. For an order of the Court prohibiting Dr. David Fowler from testifying regarding the opinions of any other non-testifying experts he consulted in preparation of the Forensic Panel Report or testifying that other experts agree with Dr. Fowler's opinion, analysis, or conclusions.
2. For an order of the Court compelling Defendant to disclose the specific opinions of non-testifying experts whose data, analysis, opinions, or conclusions contributed to the opinions, analysis, or conclusions contained in the Forensic Panel Report and conducting a hearing outside the presence of the jury to have Dr. Fowler identify which opinions in the report are his work alone.

Dated: March 4, 2021

Respectfully submitted,

KEITH ELLISON  
Attorney General  
State of Minnesota

/s/ Matthew Frank  
MATTHEW FRANK  
Assistant Attorney General  
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