

STATE OF MINNESOTA  
COUNTY OF HENNEPIN

DISTRICT COURT  
FOURTH JUDICIAL DISTRICT

Case Type: Criminal

State of Minnesota,

Plaintiff,

v.

J. Alexander Keung,

Thomas Kiernan Lane,

Tou Thao,

Defendants.

**NOTICE OF MOTION AND  
MOTION FOR ADMISSION OF  
DANA A. RAPHAEL *PRO HAC*  
*VICE* AND PROPOSED ORDER**

Court File No. 27-CR-20-12953

Court File No. 27-CR-20-12951

Court File No. 27-CR-20-12949

I, Matthew Frank, an active member in good standing of the bar of the State of Minnesota, move that this Court admit *pro hac vice*, Dana A. Raphael, an attorney admitted to practice in the trial courts of Virginia and Washington, DC, but not admitted to the bar of this Court, who will be co-counsel for the Plaintiff in these cases. I am aware that Rule 5 of the Minnesota General Rules of Practice requires me to (1) sign all pleadings in this case, (2) be present in person or by telephone at the proceeding at the initial hearing in which Ms. Raphael appears, and (3) be present in person or by telephone at all subsequent proceedings in these cases unless the Court, in its discretion, conducts the proceedings without the presence of Minnesota counsel.

I declare under penalty of perjury that everything that I have stated in this document is true and correct. Minn. Stat. § 358.116.

This motion is made pursuant to Minn. R. Gen. Prac. 5 and is based on the attached Affidavit of Dana A. Raphael and on all the files, records and proceedings herein. Counsel does not believe that a hearing on this motion is required or necessary.

Dated: May 17, 2022

Respectfully submitted,

KEITH ELLISON  
Attorney General  
State of Minnesota

/s/ Matthew Frank  
MATTHEW FRANK  
Assistant Attorney General  
Atty. Reg. No. 021940X

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