

FILED

No. A21-1228

April 11, 2022

STATE OF MINNESOTA
IN COURT OF APPEALS

**OFFICE OF
APPELLATE COURTS**

State of Minnesota,

Respondent,

vs.

Derek Michael Chauvin,

Appellant.

APPELLANT'S MOTION TO EXPAND WORD LIMIT

Appellant Derek Chauvin moves this Court to allow him to file an enlarged principal brief. Specifically, Mr. Chauvin asks that this Court allow him to file a principal brief with a length limit of 20,000 words, rather than the length limit of 14,000 words specified by Minn. R. App. P. 132.01, subd. 3(a)(1).

One of the primary issues in this case involves jury *voir dire*. Jury *voir dire* in this case involved two weeks of examination of potential jurors. The Court did not obtain its final juror until Juror No. 131 (although not all jurors prior to Juror No. 131 were not examined because the parties stipulated to removal for cause based on responses to the jury questionnaires). The fact section includes an extensive examination of jury *voir dire*. In addition, the fact section also includes an extensive examination of matters which occurred outside the court proceedings including the riots during the week of May

25, 2020, media publicity regarding the case, the settlement of the civil action against the City of Minneapolis and the riots in Brooklyn Center which occurred during the trial arising from the Daunte Wright shooting. Finally, the trial after *voir dire* continued for over three weeks. The total number of pages of the transcript of the trial is 5,932.

As a result of this examination of these facts outside the trial itself, as well as the extensive *voir dire* and other matters outside the courthouse, Appellant Chauvin respectfully requests that the Court allow him to file and serve a principal brief of 20,000 under Minn. R. App. 132.01 subd. 3 (a)(1). Appellant Chauvin has prepared a draft of the principal brief which is currently at 20,699 words.

Dated April 11, 2022.

/s/ William F. Mohrman
William F. Mohrman, Atty. no. 168816
Mohrman, Kaardal & Erickson, P.A.
150 South 5th Street, Suite 3100
Minneapolis, MN 55402
Telephone: (612) 341-1074
Facsimile: (612) 341-1076
Email: mohrman@mklaw.com
Attorneys for Appellant