

STATE OF MINNESOTA  
COUNTY OF HENNEPIN

DISTRICT COURT  
FOURTH JUDICIAL DISTRICT

Court File No. 27-CR-20-12646

State of Minnesota,

Plaintiff,

vs.

**DEFENDANT'S NOTICE  
OF MOTION AND MOTION FOR  
CONTINUANCE**

Derek Michael Chauvin,

Defendant.

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**TO: THE HONORABLE PETER A. CAHILL, JUDGE OF HENNEPIN COUNTY  
DISTRICT COURT; AND MATTHEW G. FRANK, ASSISTANT MINNESOTA  
ATTORNEY GENERAL.**

**NOTICE OF MOTIONS**

**PLEASE TAKE NOTICE** that on a date to be set by the Court, or as soon as this matter can be heard, the Defendant, Derek Michael Chauvin, through his attorney Eric J. Nelson, Halberg Criminal Defense, will move this Court for the following relief:

**MOTIONS**

1. A modification or extension of time for the Defendant to make initial expert witness disclosures.
2. An order requiring the Bureau of Criminal Apprehension, through the Attorney General's Office, to produce an exact duplicate copy of the BCA's investigative disclosures made to the Attorney General containing date stamps.
3. A continuance of the jury trial currently scheduled for March 8, 2020.
4. Any further relief the court deems just.

This motion is based upon the files and records in this case, the attached affidavit, the Minnesota Statutes, the Minnesota Rules of Criminal Procedure, the United States and Minnesota Constitutions and upon such other and further points and authorities as may subsequently be presented to the Court including *Wardius v. Oregon*, 412 U.S. 470, 473, 93 S.Ct. 2208, 2211 (1973); *Woodruff v. State*, 608 N.W.2d 881 (Minn. 2000); *State v. Miller*, 488 N.W.2d 235, (Minn. 1992); *State v. Kaiser*, 486 N.W.2d 384, (Minn. 1992); *State v. Lindsey*, 284 N.W.2d 368, (Minn. 1979) (citing *State v. Hunt*, 577 P.2d 720 (1978)); *State v. Burns*, 632 N.W.2d 794, (Minn. App. 2001); *State v. Hatton*, 389 N.W.2d 229 (Minn. Ct. App. 1986).

Respectfully submitted,

**HALBERG CRIMINAL DEFENSE**

Dated: December 14, 2020

/s/ Eric J. Nelson  
Eric J. Nelson  
Attorney License No. 308808  
Attorney for Defendant  
7900 Xerxes Avenue S., Ste. 1700  
Bloomington, MN 55431  
Phone: (612) 333-3673