

STATE OF MINNESOTA

DISTRICT COURT

HENNEPIN COUNTY

FOURTH JUDICIAL DISTRICT

Court File No. 27-CR-20-12951

State of Minnesota,

Plaintiff,

v.

**SUPPLEMENTAL
DISCOVERY MOTION -
BRADY GIGGLIO – PARADEE**

Thomas Kiernan Lane,

Defendants.

Thomas Kiernan Lane, through his counsel, Earl Gray and Amanda Montgomery, moves the Court for an order directing the State to produce and disclose all sustained use of force reports where force was used by a Minneapolis police officer and another officer intervened during the use of force incident. We are requesting all reports since the intervention policy that took effect on July 28, 2016.

In the alternative, the defense moves for the State to disclose the aforementioned reports to the Court for its review.

The defense further moves specifically for the production of Lt. Zimmerman's police report regarding intervention in another use of force incident as mentioned in bates #27,623, as well as any other reports where Lt. Richard Zimmerman intervened during a use of force incident, as Lt. Zimmerman has previously claimed.

This motion is based upon Brady v. Maryland, 373 U.S. 83 (1963); Gigglio v. United States, 405 U.S. 150 (1972); State v. Paradee, 403 N.W.2d 640 (Minn. 1987), and its progeny; the filed memorandum; and all of the files and records herein.

Dated this 22nd day of June, 2021.

Respectfully submitted,

s/Earl P. Gray
Earl P. Gray #37072

s/ Amanda J. Montgomery
Amanda Montgomery #0393287

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