

STATE OF MINNESOTA
COUNTY OF HENNEPIN

DISTRICT COURT
FOURTH JUDICIAL DISTRICT

State of Minnesota,

Court File No. 27-CR-20-12951

Plaintiff,

v.

**MOTION TO LIFT
GAG ORDER**

Thomas Kiernan Lane,

Defendant.

NOTICE OF MOTION

The defendant, Thomas Lane, through his counsel, Earl P. Gray, at a time and date to be decided by the Court, will move the Court for an Order lifting the Gag Order.

MOTION

The defendant, Thomas Lane, through his counsel, Earl P. Gray, filed a Motion and Memorandum, with exhibits, to dismiss the charges on July 7, 2020. Defense counsel was contacted by several media outlets on July 8, 2020 and was interviewed by a few. Based on this, the Court issued a Gag Order on July 9, 2020. The defendant objects to that Order and requests it be vacated.

Nothing defense counsel filed or said warrants this Court to issue a Gag Order. The memorandum filed was supported by exhibits provided to us by the State. Defense counsel, because the videos were not public at the time of the interviews, attempted to explain the dismissal motion and the exhibits as it was grossly unfair to hold back the videos and only allow the reading of the transcripts of the videos. Indeed any statement this defense counsel made could barely

remedy the prejudicial publicity cited in Mr. Eric Nelson's objection memorandum.

This notice of motion and motion is based on all of the files and records herein.

Dated this 13th day of July, 2020

Respectfully Submitted,

s/ Earl Gray

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