

STATE OF MINNESOTA  
COUNTY OF HENNEPIN

DISTRICT COURT  
FOURTH JUDICIAL DISTRICT

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State of Minnesota,

Court File No. 27-CR-20-12951

Plaintiff,

v.

**NOTICE OF MOTION AND MOTION  
TO FIND KEITH ELLISON & JOHN  
STILES IN CONTEMPT OF COURT**

Thomas Kiernan Lane,

Defendant.

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**NOTICE OF MOTION & 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 holding the Attorney General's Office – specifically Keith Ellison and John Stiles – in contempt of court for its violation of the Court's July 9, 2020 Gag Order.

**MEMORANDUM**

On Monday July 13, 2020 in violation of the Court's Gag Order, the Attorney General's Office, Keith Ellison and John Stiles, emailed to the media the attached email.

The attached email is an obvious violation of the Gag Order. Ellison should be jailed along with Stiles. There is no reason to announce that these so called "super stars" are joining the prosecution and that they're doing it for free. It is an obvious statement to the public that these "super stars" believe that our clients are guilty. Further proof that the news release was done to influence the public is that it was released by John Stiles, who, according to Google, is a chief

strategy officer and builds reputations and brands.

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

Dated this 14<sup>th</sup> day of July, 2020

Respectfully Submitted,

s/ Earl Gray

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