

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

Court File No. 27-CR-20-12953

State of Minnesota,

Plaintiff,

vs.

**MOTION AND MEMORANDUM
OF LAW TO ALLOW VIDEO
EXHIBITS**

J. Alexander Kueng,

Defendant.

TO: THE HONORABLE PETER A. CAHILL, JUDGE OF HENNEPIN COUNTY DISTRICT COURT; KEITH ELLISON, ATTORNEY GENERAL OF MINNESOTA.

On August 27, 2020 Mr. Kueng, through Counsel, filed a motion seeking a change of venue. Subsequently all Co-Defendant's have sought similar relief.

Following the September 11, 2020 pre-trial hearing Counsel filed a supplemental memorandum documenting several felony acts which occurred after court. In that instance the lives of both counsel and client were put in danger. On October 15, 2020 an emergency hearing was held – no defendant appeared at this hearing.

Following the hearing, once again, protestors engaged in criminal conduct placing at least one attorney and the general public at risk. This conduct was captured on video. The video depicts a protestor committing acts in violation of Minn. Stat. 609.749 Subd. 3 (4) – Harassment, Stalking. A separate video depicts a protestor being arrested and deputies finding a gun in the course of the arrest.

MOTION

Mr. Kueng now moves this court for leave to file video evidence of the events following the October 15, 2020 hearing. This relief is necessary because this court has entered an order forbidding parties from offering video evidence as exhibits to motions. Counsel's motion seeks leave to add the video as exhibits to a forthcoming second supplement memorandum in support of change of venue based on the events following the October 15, 2020 hearing.

Respectfully submitted,

Dated: October 16, 2020

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