

STATE OF MINNESOTA  
COUNTY OF HENNEPIN

DISTRICT COURT  
FOURTH JUDICIAL DISTRICT

State of Minnesota,

Court File No.: 27-CR-20-12953

Plaintiff,

vs.

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

J. Alexander Kueng,

Defendant.

**TO: The Honorable Peter Cahill, Judge of Hennepin County District Court;  
Matthew Frank, Assistant Attorney General; Josh Larson, Asst. Hennepin  
County Attorney.**

**PLEASE TAKE NOTICE** that on June 21, 2022 at 8:30 a.m., or as soon thereafter as counsel may be heard, Mr. Kueng will moves this Court for an order continuing the trial in this matter to a date after April 3, 2023.

#### **BACKGROUND**

On May 31, 2022 this matter came before the Court to consider Defendants Thao and Kueng's renewed motions to change venue or continue the trial. Both Thao and Kueng requested the trial commence 1 year after the sentencing in the Federal Court Case involving both Defendants. See Index 588 as to Kueng. On June 6, 2022 this Court issued an order continuing the trial date to January 9, 2023. See Index # 597. On June 17, 2022 the State entered a speedy trial demand. See Index # 602. The State's demand for a speedy trial followed a teleconference (June

7, 2022) wherein the instant continuance request was discussed. Mr. Frank's position was that the State "Can't agree to a continuance." Counsel for Mr. Thao has informed the Court that he has no objection to this continuance request.

On March 9, 2022 and May 27, 2022 the Court conducted chambers conferences with the parties to discuss plea negotiations, trial scheduling and other matters. During each of those meetings Counsel for Mr. Kueng informed the Court and parties that he was unavailable for trial from January through March 2023. Counsel's unavailability is due a scheduling conflict of a personal nature. The Court subsequently confirmed its awareness of the scheduling issue by e-mail.

**NOW COMES** J. Alexander Kueng, by and through Counsel, and moves this Court for an order continuing the trial date in this matter to a date on or after April 3, 2023.

Respectfully submitted,

Date: June 19, 2022

/s/ Thomas C. Plunkett

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