

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

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State of Minnesota,

Court File No. 27-CR-24-1844

Plaintiff,

v.

Ryan Londregan,

Defendant.

**DEFENDANT RYAN LONDREGAN'S  
NOTICE OF MOTION AND MOTION TO  
DISMISS THE STATE'S COMPLAINT OR,  
ALTERNATIVELY, DISQUALIFY THE  
HENNEPIN COUNTY ATTORNEY'S  
OFFICE FOR ABUSE OF THE GRAND-  
JURY PROCESS**

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PLEASE TAKE NOTICE that Defendant Ryan Londregan ("Defendant" or "Londregan") moves the Court for an order dismissing the State's Complaint for abuse of the grand-jury process, in that the State empaneled a grand jury and, when the grand jury did not return an indictment, proceeded to charge Defendant via Complaint, thus using the grand jury improperly as a substitute for discovery.

Defendant respectfully requests that the Court issue a briefing schedule and bases this motion on the legal and factual arguments contained in Defendant's Memorandum of Law filed in accordance therewith, together with all the pleadings and papers filed in this action and any other evidence or argument that may be presented in connection with the hearing on this motion.

This motion will be heard by the Court at a date, time, and location to be announced.

DATED: January 24, 2024

Respectfully Submitted,

**MADEL PA**

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