

STATE OF MINNESOTA
COUNTY OF HENNEPIN

DISTRICT COURT
FOURTH JUDICIAL DISTRICT

Court File No.: 27-CR-21-1171

State of Minnesota,

Plaintiff,

vs.

**NOTICE OF MOTION
AND MOTION TO DISMISS**

Ibssa Youssuf,

Defendant.

TO: THE HONORABLE JAY QUAM, JUDGE OF DISTRICT COURT; MARY MORIARTY, HENNEPIN COUNTY ATTORNEY; AND CHRISTOPHER FILIPSKI, ASSISTANT HENNEPIN COUNTY ATTORNEY, C2100 GOVERNMENT CENTER, 300 SOUTH SIXTH STREET, MINNEAPOLIS, MN 55487.

NOTICE OF MOTION AND MOTION

PLEASE TAKE NOTICE that on **February 21, 2023 at 9:00 a.m.** or as soon thereafter as counsel may be heard, Mr. Ibssa Youssuf, by and through the below-signed attorney, will move this court, pursuant to Minn. R. Crim. P. 11.02(a), for:

1. An order dismissing Count One for lack of probable cause to proceed to trial. State v. Florence, 239 N.W.2d 892 (Minn. 1976).
2. Such other relief as the Court deems just and proper.

Respectfully submitted,

OFFICE OF THE HENNEPIN COUNTY PUBLIC DEFENDER
LISA M. LOPEZ – FIRST ASSISTANT PUBLIC DEFENDER

Date: February 8, 2023

By: /s/

Lynne McMullen (#0403925)
Assistant Public Defender
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