

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

STATE OF MINNESOTA,

PLAINTIFF,

**NOTICE OF MOTION AND MOTION  
TO DISMISS**

vs.

RAMADAN HAKIN CAMPBELL,

Court File No. 27-CR-18-18396

DEFENDANT.

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TO: THE HONORABLE GEORGE BORER, REFEREE OF DISTRICT COURT AND  
CHRISTOPHER FREEMAN, ASSISTANT HENNEPIN COUNTY ATTORNEY.

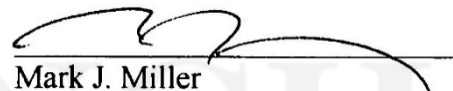
**NOTICE OF MOTION**

**PLEASE TAKE NOTICE**, that on the 7th day of February, 2024, at 10:00am., or as soon thereafter as counsel may be heard, the Defendant, will move this Court as follows:

**MOTION**

The Defendant, by and through undersigned counsel, moves this Court to dismiss the complaint in the above-entitled matter for the State's failure to file within three years of the date of a finding of the defendant as incompetent, written notice of intent to prosecute when the defendant regains competency. This motion is based upon all the files, records and proceedings herein, Minnesota Rule of Criminal Procedure 20.01, subd. 8 and *State v. Coughlin*, 731 N.W.2nd 862, (Minn. App. 2007).

Respectfully Submitted,

**Mark J. Miller**

Dated: January 30, 2024

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