STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

SECOND JUDICIAL DISTRICT CRIMINAL COURT DIVISION

State of Minnesota,

Court File No: 62-CR-15-4175

Plaintiff.

VS.

DEFENDANT'S MOTION TO EXCLUDE EVIDENCE

The Archdiocese of Saint Paul and Minneapolis, a Minnesota Corporation 226 Summit Avenue Saint Paul, MN 55102,

Defendant.

Defendant, The Archdiocese of Saint Paul and Minneapolis (the "Archdiocese Corporation"), through its undersigned attorneys, hereby moves the Court for an Order excluding evidence relating to (1) Wehmeyer's sexual orientation; (2) Wehmeyer's substance use and other bad conduct; and (3) the conduct of other priests. The Archdiocese Corporation's motion to exclude is supported by an accompanying memorandum of law and the arguments of counsel to be made at the Omnibus Hearing.

Dated: January 29, 2016

Respectfully submitted,

Joseph T. Dixon (#283903)

Andrew F. Johnson (#390783)

Chelsea Brennan DesAutels (#392036)

FREDRIKSON & BYRON, P.A.

200 South Sixth Street, Suite 4000

Minneapolis MN 55402-1425

Phone: (612) 492-7000

Fax: (612) 492-7077

jdixon@fredlaw.com

ajohnson@fredlaw.com

cbrennandesautels@fredlaw.com

ATTORNEYS FOR DEFENDANT