

**IN THE SUPREME COURT OF PENNSYLVANIA**

---

**Docket No. 125 EM 2019**

---

**In re: Conflict of Interest of the Office of the Philadelphia District Attorney,  
Supplemental Petition of Maureen Faulkner, Widow of deceased Police  
Officer Daniel Faulkner**

---

**APPLICATION FOR LEAVE TO FILE  
SUPPLEMENT TO KING'S BENCH PETITION**

---

**BOCHETTO & LENTZ, P.C.**  
George Bochetto, Esquire (27783)  
David P. Heim, Esquire (84323)  
John O'Connell, Esquire (205572)  
1524 Locust Street  
Philadelphia, PA 19102  
(215) 735-3900

*Attorneys for Petitioner Maureen  
Faulkner*

Petitioner, Maureen Faulkner (“Mrs. Faulkner”), files this Application for Leave to File a Supplement to the King’s Bench Petition filed on November 12, 2019. In support thereof, Petitioner avers as follows:

1. On November 12, 2019, Petitioner filed a King’s Bench Petition seeking the disqualification of the Philadelphia District Attorney’s Office from further involvement in the prosecution of *Commonwealth v. Mumia Abu-Jamal*.
2. Since the filing of the King’s Bench Petition, Petitioner has discovered additional evidence of conflicts of interest that further support the requested relief to disqualify the Philadelphia District Attorney’s Office.
3. Petitioner has, therefore, prepared a Supplement to her King’s Bench Petition, including appending additional exhibits, a copy of which is attached as Exhibit “1.”

**WHEREFORE**, Petitioner respectfully requests this Court GRANT LEAVE to file the Supplement to Petitioner’s King’s Bench Petition.

Respectfully submitted,

**BOCHETTO & LENTZ, P.C.**

Dated: November 25, 2019

By: /s/ George Bochetto  
George Bochetto, Esquire  
David P. Heim, Esquire  
John O’Connell, Esquire

*Attorneys for Petitioner*

## **CERTIFICATE OF PUBLIC ACCESS COMPLIANCE**

I certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.

Dated: November 25, 2019

/s/ George Bochetto  
George Bochetto, Esquire

# **EXHIBIT 1**

**IN THE SUPREME COURT OF PENNSYLVANIA**

---

**Docket No. 125 EM 2019**

---

**In re: Conflict of Interest of the Office of the Philadelphia District Attorney,  
Supplemental Petition of Maureen Faulkner, Widow of deceased Police  
Officer Daniel Faulkner**

---

**APPLICATION TO SUPPLEMENT KING'S BENCH PETITION**

---

**BOCHETTO & LENTZ, P.C.**  
George Bochetto, Esquire (27783)  
David P. Heim, Esquire (84323)  
John O'Connell, Esquire (205572)  
1524 Locust Street  
Philadelphia, PA 19102  
(215) 735-3900

*Attorneys for Petitioner Maureen  
Faulkner*

## INTRODUCTION

On November 12, 2019, Petitioner filed a King's Bench Petition asserting, in part, that "...high ranking officials from the Philadelphia District Attorney's Office -- including the District Attorney himself -- suffer from personal conflicts of interest which are so obvious and so incendiary that the Office's continued representation of the Commonwealth all but guarantees a bias and unjust adjudication of the *Jamal* case." Since that Petition was filed, additional facts relevant to District Attorney Larry Krasner's personal conflicts in the *Jamal* case have been discovered by counsel for Petitioner. The purpose of this supplement is to include those new facts as additional "...dispositive evidence of Krasner's bias in this matter..." These new facts reveal that Krasner himself was a "movement attorney" and "strategist" representing advocates for Mumia Abu-Jamal's exoneration and freedom. When combined with the facts already presented these new facts demonstrate an obvious and overwhelming appearance of impropriety and conflict of interest disqualifying Krasner and his office from further involvement in the *Jamal* matter.

It is important to note that none of these facts have been previously disclosed by Krasner to the Court or Faulkner's widow, Maureen, when he responded to Petitioner's prior Petition to Intervene in the Superior Court, wherein he denied there were any actionable conflicts of interest involving him and his

Office. Petitioner respectfully requests the new facts outlined below be incorporated into the original King's Bench Petition and be considered by the Court.

**I. Krasner's Close Association with the Movement to Free Mumia Abu-Jamal and Legal Work on Behalf of Jamal Supporters.**

The National Lawyers Guild ("NLG") was started in 1937 as an organization of lawyers dedicated to representing labor unions and oppressed minorities. Over the years, the focus of the organization broadened to include a variety of causes, including the representation of "political prisoners" and "activists." Its website describes NLG as a members run organization. As early as 1998, Mumia Abu-Jamal became a member of the NLG's governing board.<sup>1</sup> Jamal remains a member today as "Jailhouse lawyer and VP Emeritus."<sup>2</sup>

In the summer of 2000, two years after Jamal joined the NLG board, the Republican National Convention ("RNC") was held in the City of Philadelphia. In advance of the convention, a variety of groups opposed to the Republican party worked together to organize protests at the convention. The organized protests were advertised in advance of the convention on a variety of websites and fliers. The first protest was scheduled for August 1, 2000 as "a Day of Resistance to the

---

<sup>1</sup> See Ex. O, NLG December 6, 1998 Board and Staff. The Exhibits attached to this Supplement continue from the last Exhibit in the original King's Bench Petition.

<sup>2</sup> See Ex. P.

Death Penalty and the Execution of Mumia Abu-Jamal.”<sup>3</sup> During the protest, hundreds of people were arrested for a variety of offenses including assault on police, obstruction of major roadways and various acts of vandalism.

In response to these arrests, the NLG organized a team of lawyers and non-lawyers in Philadelphia to provide legal representation to the protestors.

The NLG organized lawyers operated under the name “R2K Legal.”<sup>4</sup> R2K Legal was co-founded by an NLG member named Kris Hermes (“Hermes”). Like Mumia Abu-Jamal, Hermes is a vice president of the NLG. (Hermes is listed in at least one publication directly above Mumia Abu-Jamal as a fellow “VP.”)<sup>5</sup> The R2K Legal website explained the political purpose of the legal team and the fact that it was being housed out of the NLG Philadelphia headquarters:

R2K Legal is a collective of over 400 activists that were arrested during the Republican National Convention protests in Philadelphia, PA (the RNC 420). Along with supporters and attorneys, they are taking their legal defense into their own hands, and forcing the process to be political.

**Contact Info**

R2K Legal Collective  
c/o *National Lawyers Guild*  
924 Cherry Street, 5th Floor  
Philadelphia, PA 1910”

---

<sup>3</sup> See Ex. Q, Flier.

<sup>4</sup> See Ex. R, R2K address and website.

<sup>5</sup> See Ex. S, Guild Notes from the summer of 2014 referencing Hermes.

In addition to being organized by NLG where Jamal was a member, R2K Legal was also aligned with the movement to free Mumia Abu-Jamal in other ways. In 2016, Hermes wrote a book recounting the lessons learned in the 2000 RNC protest called *Crashing the Party, Legacies and Lessons from the RNC 2000* ("*Crashing the Party*"). In his book and related interviews, Hermes detailed how the protest of the RNC was planned and how Mumia Abu-Jamal's name and case became prominent parts of those protests:

As governor of Texas, George W. Bush epitomized the injustice of the criminal legal system. He was notorious for having signed execution warrants for 138 people and executing 152 people-more that any other governor in the history of Texas up to that point.

(*Crashing the Party* at page 24.)<sup>6</sup>

\* \* \* \*

The demands of the August 1 Direct Action Coalition were to free Mumia Abu-Jamal and all political prisoners, abolish the prison industrial complex and the death penalty, stop police violence, and end the corporate war on the poor.

(*Crashing the Party* at page 24 and attached Flier.)<sup>7</sup>

The importance of Mumia Abu-Jamal to the political movement that the RNC protest represented has been confirmed by members of the R2K Legal

---

<sup>6</sup> See Ex. T, *Crashing the Party* (excerpted pages attached.)

<sup>7</sup> See Ex. U, flier distributed for the protests, prominently displaying Jamal's prison photograph.

collective. In October 2010, an author with the *nom de guerre* “Susan Subways” published an interview with R2K Legal participants from the Student Liberation Action Movement (“SLAM”). SLAM was one of the protest groups responsible for making Mumia Abu-Jamal’s exoneration and freedom a prominent part of the RNC protest.<sup>8</sup> The interview included the following account of the work of the R2K Legal team:

**What inspired you to participate in R2K?**

..... The Republican National Convention decided to hold their convention in Philadelphia, which was very symbolic for them in terms of “the cradle of liberty.”..... We know Philadelphia as the place Mumia, a journalist, writer and educator, was framed for murder and placed on death row. So to see the Republicans going to Philadelphia – many of us took it as a direct challenge to us to bring those politics around prisons and political prisoners to the forefront of the national consciousness.<sup>9</sup>

During their representation of the protestors, the R2K Legal team website included numerous references to Mumia Abu-Jamal:

- Samples of his writings as part of the explanation of the R2K organization’s “Background,” Walkin' in the Shadow of Death, by

---

<sup>8</sup> See Ex. T, Crashing the Party (excerpted pages attached.)

<sup>9</sup> See Ex. V.

Mumia Abu-Jamal (other articles and columns by Mumia and death penalty info).<sup>10</sup>

- An R2K press release announcing a November 8, 2000 press conference to address the “mass trials” of the protestors. The press release described the protestors’ arrest as follows:

During the Republican National Convention, thousands of people took to the streets demanding:

FREEDOM FOR MUMIA ABU-JAMAL AND ALL  
POLITICAL PRISONERS

ABOLISH THE DEATH PENALTY

ABOLISH THE PRISON INDUSTRIAL COMPLEX

STOP POLICE TERROR

END THE CORPORATE WAR ON THE POOR

POWER TO OUR COMMUNITIES

As protestors head to trial, they reissue these demands and reaffirm their commitment to protest until our voices are heard. They stand in solidarity with all people that have been brutalized, exploited and criminalized by the Criminal Injustice system and forgotten by the politicians.<sup>11</sup>

---

<sup>10</sup> See Ex. W

<sup>11</sup> See Ex. X.

- An essay authored by Mumia Abu-Jamal himself in December 2000 criticizing the arrest of the convention protestors.<sup>12</sup>

In the Acknowledgement section of his book, Hermes thanked the “Movement attorneys who were an important part of the R2K Legal Collective and took direction from their dissident clients...”<sup>13</sup> Listed among the “Movement attorneys” are “Paul Hetznecker, *Larry Krasner*, Paul Messing, David Rudovsky and Lester Roy Zipris, as well as public defenders Bradley Bridge, Meg Flores and Shawn Nolan.”<sup>14</sup> According to Hermes, these lawyers worked in concert on the defense of the protestors. (At the time R2K Legal was formed, the law firm where Messing and Rudovsky were named partners was representing Mumia Abu-Jamal in federal court appeals. In fact, the hearings in Jamal’s federal appeals were occurring at the same time as the prosecutions of the RNC protestors.)<sup>15</sup>

Also acknowledged in the Hermes book are “core members of the R2K Legal Collective” including Caleb Arnold. Arnold was among the protestors arrested on August 1<sup>st</sup>, the day of the “Free Mumia” protest. (Krasner and the R2K

---

<sup>12</sup> See Ex. Y.

<sup>13</sup> See Ex T, *Crashing the Party* at page vii.

<sup>14</sup> *Id.* (Emphasis added).

<sup>15</sup> See Ex. Z, a copy of the docket from Mumia Abu-Jamal’s federal habeas corpus case. In the flier referred to earlier, distributed in advance of the August 1<sup>st</sup> protest, supporters were also urged to “Stand With Mumia On His First Day in Federal Court!” A copy is attached as Ex “Q.”

collective represented Arnold and his co-defendant, Danielle Redden, in connection with an arrest in a subsequent protest.)<sup>16</sup>

Arnold was subsequently hired by Krasner in May 2017 to work at the District Attorney's Office and currently heads the District Attorney's Immigrant Rights Unit.<sup>17</sup>

In addition to Arnold, another current employee of the District Attorney's Office is acknowledged in Hermes' book for her work as a "dedicated activist" on behalf of the protestors: Jody Dodd. Dodd was eventually employed by Krasner's law office and was (as noted in the original Petition) an active member of the Friends of Mumia Abu-Jamal.<sup>18</sup>

## **II. Krasner's Work as an Attorney and Strategist at R2K**

When Krasner joined the NLG organized legal collective, R2K, he became one of only 5 private attorneys in Philadelphia working on the effort:

### **Lawyers**

#### **Public Defenders**

Brad Bridge  
(215) 557-4960  
[Bbridge@philadefender.org](mailto:Bbridge@philadefender.org)

---

<sup>16</sup> See Ex. AA, Excerpts of the Notes of Testimony in *Commonwealth v Caleb Arnold and Danielle Redden*.

<sup>17</sup> See Ex. BB, press release referencing Arnold hiring is attached.

<sup>18</sup> See King's Bench Petition at page 20.

Meg Flores  
(215) 972-4524

Shawn Nolan  
(215) 557-4995  
[nolanshawn@Hotmail.com](mailto:nolanshawn@Hotmail.com)

**Private Lawyers**  
Paul Hetznecker  
(215) 893-9640

**Larry Krasner**  
(215) 731-9500

Ron Mcguire (New Jersey)  
(201) 795-0342

Messing, Epstein & Rudofsky (Phila)  
(215) 925-4400

King Downing  
(973) 483-0561<sup>19</sup>

In fact, Krasner’s role at R2K was not limited to representing individual defendants but included a prominent role in deciding the collective political and legal strategy for R2K. According to the Frequently Asked Questions (“FAQ”) on the R2K Legal website, the R2K was comprised of multiple groups with the “Activist” making the final decisions:

### **Who is R2K Legal?**

The R2K Legal Collective is comprised of:

---

<sup>19</sup> See Ex. CC, R2K “Lawyers.”

A) Activists

B) working groups composed of activists (such as Outreach, Fundraising, and Media)

C) the Legal Strategy Group (a closed group of attorneys, defendants, and supporters that has access to some confidential information but is not authorized to make decisions for the entire collective without approval)

D) the Legal Team (criminal and civil lawyers who have volunteered or are paid to work on these cases, including PA public defenders, PA private attorneys, NY private attorneys, and national criminal law experts)

The A group (activists) has the authority to consense on proposals that come from groups B and C. The collective has open meetings every Tuesday night at 7:30 PM at 1501 Cherry Street, Philadelphia, PA. Tuesday meetings include reports from the defendants' meeting, working groups, meetings in other cities and regions, and the legal strategy group. Defendants (from all cities) have the last word on decisions affecting them.<sup>20</sup>

Krasner was a part of group D and was one of two Philadelphia lawyers in the Legal Strategy Group. The R2K website provides that:

At this time, the Legal Strategy Group contains:

- 2 PA private attorneys, Larry Krasner and Paul Hetznecker
- 2 NY private attorneys, Anastasia [last name?] and Ron McGuire (who also works for SLAM)

---

<sup>20</sup> See Ex. DD, Who is R2K?

- 1 NJ private attorney, King Downing

*These lawyers are committed to the progressive political goals of many of the protesters and are willing to utilize solidarity as a tactic for achieving the group's goals.*<sup>21</sup>

As noted earlier, one of the “group’s goals” was to free Mumia Abu-Jamal. The R2K FAQ page also noted that “The R2K legal team has experience with political legal strategy.”<sup>22</sup>

In an interview for the NLG website to promote his book in 2016, Hermes explained the benefits of the R2K Legal collective that Krasner was a part of:

Legal workers, and law collectives in particular, help establish an important link between the political movements the defendants are part of and the lawyers representing them.

Legal collectives have the unique opportunity to politicize criminal cases, including organizing the defendants to be strategic and *bring politics into the courtroom....*<sup>23</sup>

Krasner’s work as a lead strategist and attorney for R2K Legal provides a direct link between him and the political movement to free Mumia Abu-Jamal.

---

<sup>21</sup> *Id.* (emphasis added). One of Krasner’s colleagues on the 4-person strategy team was Ron McGuire. At the time he was working with Krasner in the legal strategies group, McGuire was also the attorney for SLAM, the previously mentioned group advocating for Jamal’s exoneration and release.

<sup>22</sup> *Id.*

<sup>23</sup> *See* Ex. EE Hermes interview (emphasis added).

### **III. The R2K Effort to Disqualify a Judge Based on Links to Police, Daniel Faulkner and Mumia Abu-Jamal**

The direct link of Krasner and R2K to the movement to free Mumia Abu-Jamal was also demonstrated during the trials of the misdemeanor cases of “Free Mumia” protestors, presided over by Municipal Court Judge Seamus McCaffery (“Judge McCaffery”).

The mass arrest of protestors’ in August 2000 had a variety of outcomes in court, including felony charges being dismissed and cases remanded for misdemeanor trials. Some of the remanded cases were assigned to Judge McCaffery, who at the time was a Municipal Court Judge in Philadelphia. According to Hermes, the R2K Legal Team was concerned about Judge McCaffery because he was “pro-cop.” In response to these concerns, the R2K Legal Team, where Krasner was an attorney and one of 2 Philadelphia legal/political strategists, began to research ways to have Judge McCaffery removed from the case. The R2K Legal Team researched and assisted in filing multiple Motions to Recuse McCaffery from all cases involving the arrest of protesters.<sup>24</sup>

---

<sup>24</sup> Petitioner has been unable to locate the actual motions, but upon information and belief they are in the possession of the District Attorney’s Office in the prosecutor’s file for the cases. Hermes’ book cites to one of the actual motions as a source. *See Ex T, Crashing the Party* (excerpted pages attached).

The first Motion was filed on behalf of a single protestor, George Ripley and “others similarly situated,” including those represented individually by Krasner. That motion focused on comments McCaffery had made in advance of the RNC about how protestors were going to be handled by the court. The second motion was prepared and filed by *pro se* defendants who were assisted and prepared for court appearances by the R2K Legal Team. The second motion was similar to the first motion but “What differentiated the *pro se* motion . . . . was the additional evidence showing McCaffery’s pro-cop bias. . . . his longtime service as a police officer, his tenure as a police officer during both Daniel Faulkner’s murder and the trial of Mumia Abu-Jamal.”<sup>25</sup> In his book, Hermes recounts how the R2K Legal attorneys and activists worked as a group to prepare the Recusal Motions and to prepare the *pro se* litigants to argue in court. On the R2K website he maintained during the pendency of the protestors’ cases, Hermes provided periodic legal updates. One of the “Legal Updates” confirmed that all of the R2K attorneys agreed to the effort to recuse Judge McCaffery:

**Legal Updates**

01/17/01 Update from:  
R2K Legal

**Court Update**

A Recusal Motion was filed in front of Judge Seamus McCaffery on Jan 16th by the PD's office regarding

---

<sup>25</sup> See Ex T, *Crashing the Party* (excerpted pages attached).

statements McCaffery made at a panel discussion at University of Pennsylvania. However, McCaffery did not let any witnesses testify, he did not take the stand, and he denied the motion.

Mark Rifkin and Danielle Redden (two 15th and JFK defendants) filed a suplimentary [sic] Recusal Motion as pro se defendants. They filed this motion on behalf of all defendants who were to have their cases heard in front of McCaffery. ***The lawyers also signed on to it. The motion demanded McCaffery's Recusal*** because of his 20 year term as a police officer, his membership in the FOP (Fraternal Order of Police), his being Grand Marshall of the Daniel Faulkner Memorial Motorcycle Run, and his history of questionable civil disobedience convictions, etc., that lead to the ***appearance of impropriety*** or bias.<sup>26</sup>

In addition to citing to Judge McCaffery's connections to Faulkner and the Mumia case, the motion argued that those facts combined with McCaffery's history as a Judge demonstrated that he would have a "particular animus" toward the RNC protestors given the "specific purpose of their protest and the content of their speech." As noted earlier, the protestors were advocating for the freedom and exoneration of Mumia Abu-Jamal.<sup>27</sup> One of the pro-se Defendants, Mark Rifkin, who was prepared by the R2K Legal Team, argued in court that McCaffery and any other Judge who:

were members of the police force, were currently members of the Fraternal Order of Police, had signed

---

<sup>26</sup> See Ex. FF, R2K Legal Update RE: Judge McCaffery (emphasis added).

<sup>27</sup> See Ex. T, *Crashing the Party* (excerpted pages attached).

warrants at meetings of the Fraternal Order of Police had in fact been Grand Marshall in the memorial bike ride for Daniel Faulkner....”[should be recused.]<sup>28</sup>

Rifkin’s Co-Defendant was Danielle Redden who Krasner ultimately represented at her trial. At subsequent hearings in the George Ripley matter, Krasner appeared alongside fellow R2K Legal attorney, Bradley Bridge. Bridge represented George Ripley individually and Krasner appeared on behalf of the “Others Similarly Situated.” The “Similarly Situated” language related specifically to the effort to have Judge McCaffery removed from the RNC protest cases.<sup>29</sup>

## CONCLUSION

Krasner was an attorney and lead strategist on a legal team organized by a legal association on which Mumia Abu-Jamal is an active board member and which is dedicated to freeing Jamal. That same legal team sought the disqualification of a Judge because of his association with Faulkner and the Mumia Abu-Jamal case.

This Court should have grave concerns over Krasner’s failure to disclose his work on behalf of R2K, NLG and the movement to “Free Mumia” since

---

<sup>28</sup> *Id.*

<sup>29</sup> *See Ex. GG, Relevant excerpts from the transcript of proceedings from January 12, 2001 in Commonwealth vs. George Ripley and Others Similarly Situated. The relevant passage appears at page 2. The transcript also specifically notes Krasner’s presence, stating “Also Present Lawrence Krasner.”*

becoming the District Attorney. Krasner's failure to disclose these significant connections to organizations and activists that advocate for freeing Mumia Abu-Jamal, combined with the multiple points of conflict raised in the King's Bench Petition, lead to the inescapable conclusion that there are obvious appearances of impropriety and significant disqualifying conflicts of interest that prohibit Krasner and his Office from continuing to represent the Commonwealth in the *Jamal* case.

**RELIEF REQUESTED**

**WHEREFORE**, Petitioner respectfully requests this Court to supplement the King's Bench Petition with the above facts and attached Exhibits and consider same in exercising its King's Bench authority by disqualifying the Philadelphia District Attorney from the *Jamal* prosecution and order the matter referred to the Attorney General under the Commonwealth Attorney Act.

Respectfully submitted,

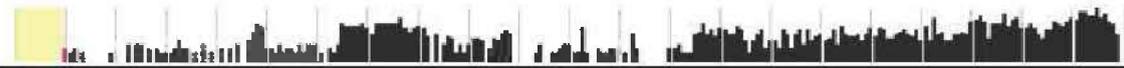
**BOCHETTO & LENTZ, P.C.**

Dated: November 25, 2019

By: /s/ George Bochetto  
George Bochetto, Esquire  
David P. Heim, Esquire  
John O'Connell, Esquire

*Attorneys for Petitioner*

# **EXHIBIT O**



[Back to top](#)

## NATIONAL V.P.s

William Harrell  
Police Accountability Project  
c/o CCR  
666 Broadway, 7th Floor  
NY, NY 10012  
212.614.6432 w  
212.614.6499 f  
[nlgvive@juno.com](mailto:nlgvive@juno.com)

Garnett Harrison  
PO BOX 1657  
St. Marys, GA 31558  
912.882.1131 w  
912.882.6903 f  
[GarnHarr@aol.com](mailto:GarnHarr@aol.com)

Alisa Wilkins  
1666 Conn. Ave NW  
Washington DC 20009  
202.328.2244 w  
202.797.2354 f  
[dclaw@radix.net](mailto:dclaw@radix.net)

[Back to top](#)

## REGIONAL V.P.s

Far West  
Rachel Gendell  
Mannion & Lowe

Kit Gage  
(Nat'l Legal Worker V.P.)  
NCARL  
3321 12th St NE  
Washington, DC 20017  
202-529-4225 (w)  
202-526-4611 (f)  
[kgage@igc.org](mailto:kgage@igc.org)

Mumia Abu-Jamal  
(Jailhouse Lawyer - V.P.)  
AM 8335 - SCI Greene  
1040 Roy Furman Hwy  
Waynesburg, PA 15370-8090

Eric Palmer  
(Law Student - V.P.)  
2447 Clybourne Pl  
Cincinnati, OH 45219  
513-381-2517  
513.556.6265 f  
[eric.palmer@law.uc.edu](mailto:eric.palmer@law.uc.edu)

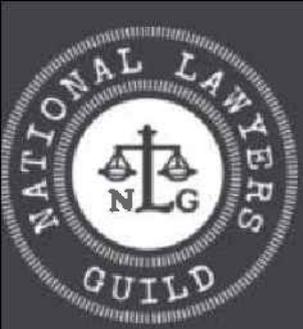
Midwest

Karen Moore



- [Home](#)
- [Membership](#)
- [Students](#)
- [Committees](#)
- [Chapters](#)
- [Member News](#)
- [Links](#)

# **EXHIBIT P**

[Donate](#)[Referral Directory](#)[Join/Renew](#)[Login](#)

# National Lawyers Guild

[Home](#) [About](#) [Our Work](#) [Our Network](#) [News](#) [Resources](#) [2019 #Law4thePeople Convention](#) [STORE](#) [Donate](#)



We need your support to help sustain our work in the streets and in the courtroom!

 [Donate Now](#)

Sign up for NLG email alerts!

First Name \*

Last Name \*

Email \*

[Subscribe](#)

## Board and Staff

### National Office Staff

#### National Officers

[Elena L. Cohen](#) - President

[Alex Westenhaver-Loretz](#) - Treasurer

[Ria Thompson-Washington](#) - Executive VP

[Ken Montenegro](#) - Executive VP

[Sasha Novis](#) - Student National VP

[Cait de Mott Grady](#) - Student National VP

[Sarah Coffey](#) - Legal Worker VP

[Mumia Abu-Jamal](#) - Jailhouse Lawyer VP Emeritus

# **EXHIBIT Q**

# PROTEST THE EXECUTIONERS' BALL!

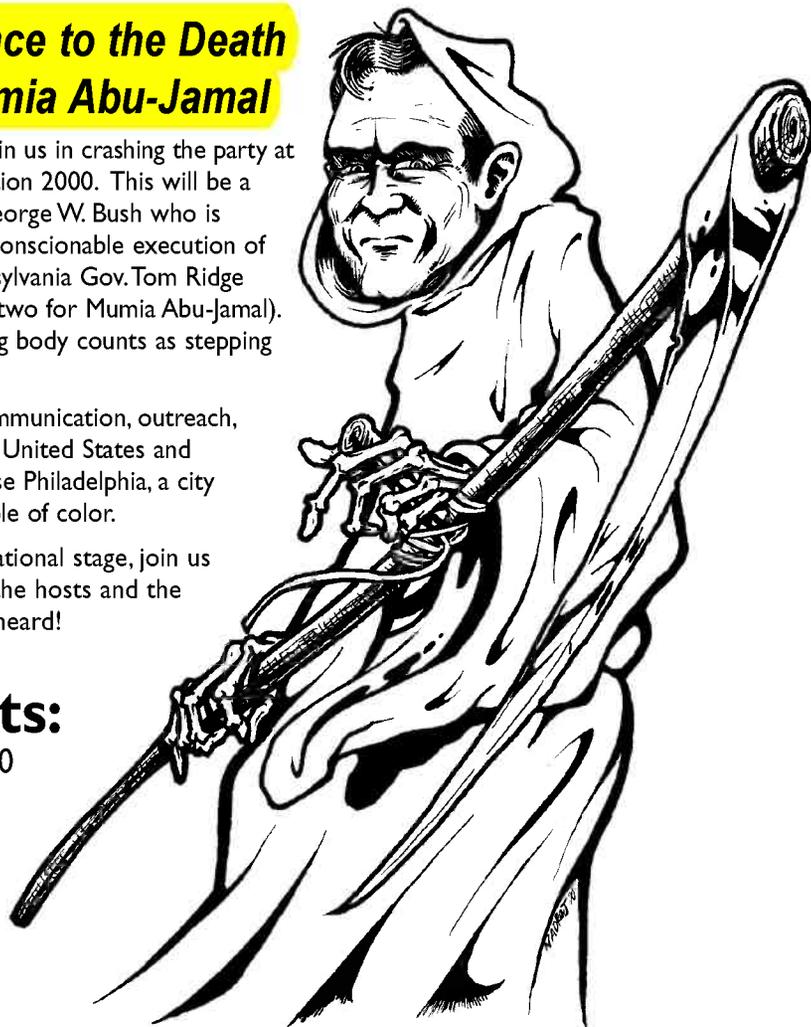
The Republican National Convention, July 31 to August 3, 2000 — Philadelphia, Pennsylvania

## Make August 1 a Day of Resistance to the Death Penalty and the Execution of Mumia Abu-Jamal

We call on all people of conscience and resistance to join us in crashing the party at their gala Executioners' Ball -- the Republican Convention 2000. This will be a coronation of the Republican presidential candidate Gov. George W. Bush who is responsible for more than 130 executions, including the unconscionable execution of Shaka Sankofa (Gary Graham). The convention host is Pennsylvania Gov. Tom Ridge (over 200 execution warrants signed in five years, including two for Mumia Abu-Jamal). Delegates include numerous other politicians intent on using body counts as stepping stones to positions of greater power.

We are dedicating August 1 as a special day of city-wide communication, outreach, protest, audacity and action against the death penalty in the United States and against the execution of Mumia Abu-Jamal. Let us also expose Philadelphia, a city with a death row larger than 37 states and nearly 90% people of color.

When this Executioner's Ball is at the center of the international stage, join us in crashing the party and denouncing the deadly deeds of the hosts and the guests of dishonor! Now is the time to make your voices heard!



## Tuesday, August 1 Events:

Details on reverse side, for info call 215-724-6120

### All Day "Honk for Mumia"

12:00 Press Conference

1:30 Interfaith Convergence

Against the Death Penalty

### 4:30-7:00 RALLY AGAINST THE DEATH PENALTY

at Thomas Paine Plaza, JFK & 15th.



In an outrageous attempt to ban all dissent, the City of Philadelphia tried to sell the entire city to the Republican Party, giving them an "omnibus permit" for much of the public space in the city. This has been defeated, but we expect that certain areas will still be blocked off by the police. We advise taking public transportation to Suburban Station, which is one block from the rally.

There will be direct action events against the criminal injustice system taking place throughout the city in which people are risking arrest. If you are interested in taking part or lending support, call 215-925-6794

**All Day: “Honk for Mumia”** throughout the city. Join the International Concerned Family & Friends of Mumia Abu-Jamal in publicizing Mumia’s case by holding signs at major intersections. Get your sign at 4601 Market St. Call 215-476-8812.

**12:00 Noon Press Conference on “Democracy and the Death Penalty?”** featuring author Jonathan Kozol, historian Marcus Rediker, Farah Jasmine Griffin, Mark Taylor, Julia Wright, and Robert Meeropol (son of Julius and Ethel Rosenberg). Location is the Old First Reformed Church, 153 N. 4th Street. Hosted by Academics for Mumia Abu-Jamal and the Pennsylvania Abolitionists United Against the Death Penalty. For more info call Mark Taylor at the Princeton Theological Seminary, 609-497-4918.

**1:30 Interfaith Convergence Against the Death Penalty** at the Friends Center (15th & Cherry) sponsored by the Religious Organizing Chapter of the Pennsylvania Abolitionists Against the Death Penalty, Events include a “speakout,” a time of prayer and reflection on our opposition to the death penalty, breakout groups, and vigiling around Center City. Signs, banners and religious garb are encouraged! For more information call Alex Volin at 215-727-3542.

**4:30-7:00 RALLY AGAINST THE DEATH PENALTY** at Thomas Paine Plaza, JFK & 15th. Join with others in “crashing the party” at the Executioners’ Ball as we unmask the executioners and expose their deadly deeds! Bring signs, banners, noisemakers, and visual displays of people either executed or sentenced to die by the state. For information contact: Pennsylvania Abolitionists, 215-724-6120 or PAUADP@aol.com

**Conveners:** Abolitionist Action Committee; Academics for Mumia Abu-Jamal; American Friends Service Committee; Campaign to End the Death Penalty; Citizens United for Alternatives to the Death Penalty; Clergy Coalition to End Executions; Herman Ferguson; Floridians for Alternatives to the Death Penalty; Free Mumia Abu-Jamal Coalition (NY); Freedom Socialist Party; Jack Heyman (International Longshore and Warehouse Union Local 10 Executive Board member); International Action Center; International Concerned Family & Friends of Mumia Abu-Jamal; Jericho Amnesty Movement; The Journey of Hope . . . From Violence to Healing; Bob Mandel (Executive Board, Oakland Education Association); Manning Marable; Robert Meeropol; Mothers Organized Against Police Terror; National Coalition to Abolish the Death Penalty; National Lawyers Guild; National Writers Union (UAW, Local 1981); New Abolitionist Society; Pennsylvania Abolitionists; October 22 Coalition to Stop Police Brutality; Philadelphia Direct Action Group; Radical Women; Refuse & Resist!; Solidarity; Western PA Committee to Free Mumia; Women for Peace & Justice For Vieques (NYC); Wooden Shoe Bookstore (Philadelphia); Writers for Mumia; Rev. S. Michael Yasutake (Executive Director, Interfaith Prisoners of Conscience Project) [Organizations listed with individuals for identification only]

## **Stand With Mumia On His First Day in Federal Court!**

The date of Mumia’s hearing has not yet been announced, but we call on people now to make preparations to descend on Philadelphia and overflow the courthouse. The hearing will be held at the Federal Court House at 6th and Market.

Steps you can take now:

- 1) Join your local Mumia coalition and get on the local emergency contact list
- 2) Make arrangements to charter a bus from your area, and start selling bus tickets now
- 3) Call an emergency meeting in your city as soon as you hear the date, and set a day for mass leafleting
- 4) Local areas should try to send a volunteer to Philadelphia to help in organizing for the day as soon as the date is announced

**Watch [www.j4mumia.org](http://www.j4mumia.org)  
for the date: ?/?/00**

For more info call 215-476-8812



# **EXHIBIT R**



# DEFEND THE RNC 420

**WE LOVE YOU SISTERS! WE LOVE YOU BROTHERS!\***

Over 400 people were arrested while protesting at the 2000 Republican National Convention (RNC) in Philadelphia, PA. This website provides information on their legal situation and the issues they are protesting.

## Home

- [Breaking News](#)
- [Breaking News Archive](#)

## R2K Legal

- [Civil Suits](#)
- [Friends of Camilo](#)
- [Lawyers](#)
- [Legal FAQ](#)
- [Legal Forms](#)
- [Legal Statistics](#)
- [Legal Timeline](#)
- [Legal Updates](#)
- [Mayor/DA Contact](#)
- [Press Releases](#)

R2K Legal Contact:  
[info@r2klegal.org](mailto:info@r2klegal.org)

Also see **Local Support** for contacts in your area.

## Calendar

You can **post** trial dates, events, meetings, etc. on the [R2K calendar](#).

## Local Support

- Support groups are in the following areas:
- Arcata, CA
  - Boston, MA
  - Connecticut
  - New Jersey
  - New York, NY
  - Philadelphia, PA
  - Providence, RI
  - Virginia

**R2K Legal:** [Civil Suits](#) | [Friends of Camilo](#) | [Lawyers](#) | [Legal FAQ](#) | [Legal Forms](#) | [Legal Updates](#) | [Press Releases](#) | [Legal Statistics](#) | [Mayor/DA Contact](#)

## R2K Legal

R2K Legal is a collective of over 400 activists that were arrested during the Republican National Convention protests in Philadelphia, PA (the RNC 420). Along with supporters and attorneys, they are taking their legal defense into their own hands, and forcing the process to be political.

## Contact Info

R2K Legal Collective  
c/o National Lawyers Guild  
924 Cherry Street, 5th Floor  
Philadelphia, PA 19107  
[info@r2klegal.org](mailto:info@r2klegal.org)

If you would like to support the RNC 420 defendants and the issues they are protesting, please contact us at the email above, and check the [calendar](#) for future meetings and events.

For the latest legal updates and related information, see [Breaking News](#).

Thank you for your support.

Notice: All information is subject to change, it's your responsibility to confirm with [R2K Legal](#).  
[previous.r2klegal.org](http://previous.r2klegal.org)

## About Us

Who are we? The R2K Network. Why are we protesting? Here's some [background](#).

[Add yours...](#)

## Donate

Please help support our Legal Fund for Camille and the Timoney 3 cases. To make a donation, contact: [info@r2klegal.org](mailto:info@r2klegal.org)

## Supporters

Letters of support:

- [Activist Organizations](#)
  - [AFSCME Union](#)
  - [APWU Union](#)
  - [First Unitarian Church of Philadelphia](#)
  - [Members of Congress](#)
  - National Association for Socially Responsible Organizations
- [Add Yours...](#)

R2K Mobilization Links:  
Ad Hoc Committee to Defend Health Care  
[phillyhealth.org](http://phillyhealth.org)

# **EXHIBIT S**

# Guild Notes

a publication of the national lawyers guild foundation

volume XXXIX, no. 4, winter 2014



## **“Hands Up, Don’t Shoot!”**

NLG coordinates legal support efforts for protesters in Ferguson, MO and elsewhere (p.13)

- and -

NLG files lawsuit against water shut-offs in Detroit (p. 6)

Elections and voting results (p.18)

2014 Law for the People round-up (p. 19)

NLG Students in Action (p. 15)

# NATIONAL COMMITTEES, PROJECTS AND TASK FORCES

## *Amicus Committee*

Zachary Wolfe  
amicus@nlg.org

## *Animal Rights Activism Committee*

animalrights@nlg.org

## *Anti-Racism Committee*

Hannah Adams  
Alana Roth  
antiracism@nlg.org

## *Anti-Sexism Committee*

Kerry McLean  
antisexism@nlg.org

## *Committee for Democratic Communications*

Michael Lee  
cdc@nlg.org

## *Disability Rights Committee*

Timothy Lunceford  
timothynyc4@aim.com

## *Drug Policy Committee*

Jesse Stout  
David Frank  
drugpolicy@nlg.org

## *Environmental Justice Committee*

Joel Kupferman  
environmentaljustice@nlg.org

## *International Committee*

Jeanne Mirer  
Natasha Bannan  
Suzanne Adely  
international@nlg.org

## *Labor & Employment Committee*

Anthony Prince  
anthonyd.princelaw@yahoo.com

## *Legal Workers Committee*

Kris Hermes  
legalworkervp@nlg.org

## *Mass Defense Committee*

Joshua Norkin  
massdefensechair@nlg.org

## *Military Law Task Force*

Kathy Gilbert  
mltf@nlg.org

## *Next Generation Committee*

Samantha Godwin  
Lindsey Schromen-Wawrin  
nextgen@nlg.org

## *Prison Law Project*

Ian Head  
plp@nlg.org

## *Queer Caucus*

kt crossman  
Dana Christensen  
queercaucus@nlg.org

## *TUPOCC*

Oren Nimni  
Natali Segovia  
tupocc@gmail.com

## *National Immigration Project*

Dan Kesselbrenner  
14 Beacon St., Ste. 602  
Boston, MA 02108  
(617) 227-9727  
dan@nationalimmigrationproject.org

## *National Police Accountability Project*

Brigitt Keller  
499 7th Ave., Ste. 12 N  
New York, NY 10018  
(212) 630-9939 phone  
(212) 659-0695 fax  
npap@nlg.org

## NATIONAL OFFICERS AND STAFF

### **President**

Azadeh Shahshahani

### **Executive Vice Presidents**

Marcus Kryshka  
Gabriela Lopez

### **Treasurer**

Roxana Orrell

### **National Vice Presidents**

Bina Ahmad  
Camilo Romero  
Sharlyn Grace

### **Legal Worker VP**

Kris Hermes

### **Jailhouse Lawyer VP**

Mumia Abu-Jamal  
Theresa Squillacote

### **National Student Co-VP**

Claire White  
Nicholas Klaus

### **Regional VPs**

#### *Far West*

farwestrvp@nlg.org  
Kelly Lou Densmore  
Colleen Flynn

#### *Midwest*

midwestrvp@nlg.org  
Rachel Rosnick

Sean Riddell

#### *Mid-Atlantic*

midatlanticrovp@nlg.org  
Edmundo Saballos  
Curtis Cooper

#### *Midwest*

midwestrvp@nlg.org  
Molly Armour  
Len Cavise

#### *Northeast*

northeastrvp@nlg.org  
Benjamin Evans  
Jose Lopez

#### *Northwest*

northwestrvp@nlg.org  
Francie Nevill  
Neil Fox

#### *South*

southernrvp@nlg.org  
Alistair McKenzie

#### *Tex-Oma*

texomarvp@nlg.org  
Daphne Silverman

### **National Office Staff**

#### *Membership Administrator*

Rosemarie Stupel  
membership@nlg.org

#### *Student Organizer/Researcher*

Traci Yoder  
traci@nlg.org

#### *Mass Defense Coordinator*

Abi Hassen  
abi@nlg.org

#### *Communications Coordinator*

Tasha Moro  
communications@nlg.org

### **Guild Notes is published triannually by:**

The National Lawyers Guild Foundation  
132 Nassau Street, Rm. 922  
New York, NY 10038

### **Edited and Designed by:** Tasha Moro

**Cover Photo:** A Guild Legal Observer photographs police in riot gear at a protest in Ferguson, MO. (Photo: Curtis McGuire)

### **Copy deadline for next issue:**

Monday, February 2, 2015.

**To subscribe to Guild Notes:** Contact Tasha Moro at [communications@nlg.org](mailto:communications@nlg.org). Digital subscriptions only. Print copies available for incarcerated persons. One year subscription for non-member individuals: \$50. One year subscription for institutions: \$75.

**Note:** The views expressed in Guild Notes are those of the authors. They do not necessarily reflect the opinions of the NLG as a whole.

**EXHIBIT T**



# CRASHING THE PARTY

Legacies and Lessons from the RNC 2000

KRIS HERMES

Foreword by MARINA SITRIN ★ Afterword by HEIDI BOGHOSIAN

## ACKNOWLEDGMENTS

This book is a humble testament to the thousands of people who protested in Philadelphia in the summer of 2000, hundreds of whom were arrested and thereby caught up in the criminal injustice system along with their friends and families. This book is my attempt to chronicle and acknowledge the efforts of a committed group of folks who devoted a significant portion of their lives to build a unified and militant response to state repression of political activity.

In the course of defending themselves against their own criminal charges, several RNC arrestees became core members of the R2K Legal Collective, personifying the DIY ethic of legal strategy by and for those most directly affected. They included: Jacqueline Ambrosini, Caleb Arnold, Alexis Baden-Meyer, Bill Beckler, Christopher Day, Adam Eiding, Jamie Graham, Jessica Mammarella, Dave Onion, Laura McTighe, Carlos Muños, Danielle Redden, George Ripley, Kate Sorensen, Ethan “Zeke” Spier, Camilo Viveiros, and Chris White.

Movement attorneys were an important part of the R2K Legal Collective and took direction from their dissident clients while ardently defending them against political charges. They included: Paul Hetznecker, Larry Krasner, Paul Messing, David Rudovsky, and Lester Roy Zipris, as well as public defenders Bradley Bridge,

Meg Flores, and Shawn Nolan. Some attorneys—such as King Downing from New Jersey, Anastasia Pardalis and Ron McGuire from New York—came regularly to Philadelphia to help defend protesters. Marina Sitrin and Bill Beckler, recent law school graduates at the time, temporarily relocated from New York and, along with others, helped redefine the relationship between defendant and attorney. They also helped to politicize the criminal cases and make that a key element of the legal strategy.

At the heart of the R2K Legal Collective was a group of dedicated activists who did not themselves face charges but fiercely supported RNC arrestees. They included: Jill Benowitz, Kristin Bricker, Amy Dalton, Julie Davids, Jody Dodd, Bull Gervasi, Tim Groves, Christian “xtn” Hansen, Lee James, Katie Krauss, Amy Kwasnicki, Eric Laursen, Bronwyn Lepore, Elena and Elliott Madison, Sara Marcus, Nicole Meyenberg, Rachel Neumann, Clarissa Rogers, April Rosenblum, Matthew Ruben, Curtis Rumrill, Marlene Santoyo, Mac Scott, April Smith, David Webber, Susan Whitaker, and Lesley Wood.

a lot of the comrades who were organizing these actions were really focused on dealing with anti-globalization.”<sup>100</sup> Barrow and other activists felt that the best way to connect struggles in the global south with the struggles in Philadelphia was to focus on the prison industrial complex (PIC), “because you couldn’t talk about racism, white supremacy, capitalism, and not talk about PIC.” Philadelphia activist Amadee Braxton agreed: “The political work that has most galvanized people organizing for racial justice has been the fight against the racist criminal in-justice system.” As governor of Texas, George W. Bush epitomized the injustice of the criminal legal system. He was notorious for having signed execution warrants for 138 people and executing 152 people—more than any other governor in the history of Texas up to that point.<sup>101</sup> The State of Texas had thus far been responsible for one third of U.S. executions since the death penalty was resumed in 1977.<sup>102</sup> Joining Texas in its enthusiasm for killing prisoners, Pennsylvania boasted the country’s fourth-largest death row.

Not everyone agreed with Barrow and Braxton. Some complained that the PIC theme diluted the broader message and that the focus was “too narrow.”<sup>103</sup> For Braxton, however, a more focused theme was a conscious choice “to build this movement in a particular direction—the direction of more involvement of activists of color, and by extension, communities of color.” Heated discussions around sovereignty, self-determination, and colonialism ensued. Barrow couldn’t understand how they could not focus on Mumia’s case “when the Republicans were pushing for more law and order.” Recounting the dynamic, Barrow insisted: “We are

bringing what this movement does not have, which is people of color, predominantly young people of color, predominantly female-bodied and queer and poor people of color, who are coming to this action from our own particular experiences, our own analysis, which is completely different from the analysis that is currently existing. And that has value.”

The flyer distributed by the August 1st Direct Action Coalition read, “This August we are calling for direct action at the Republican National Convention to confront the U.S. criminal justice system.”<sup>104</sup> Protest organizers had planned on “hundreds of people risking arrest and reflecting the diversity of groups and communities affected by the policies of the Republicans and Democrats.” Their efforts were directed toward making connections between international institutions and the domestic institutions that oppress people in the U.S. “While U.S.-dominated institutions like the WTO, the IMF and the World Bank wage war on the global poor ... a parallel war is waged daily on the poor and people of color in the U.S. by a criminal justice system that enforces racial and economic injustice. It is time for the different currents in this movement to stand together against this system of criminal injustice and for real democracy.” The demands of the August 1 Direct Action Coalition were to free Mumia Abu-Jamal and all political prisoners, abolish the prison industrial complex and the death penalty, stop police violence, and end the corporate war on the poor.

On August 1, 2000, direct action paralyzed the downtown with street theater, satire, and civil disobedience.

In 2000, McCaffery was fifty years old and had already completed a twenty-year career as a “decorated” officer in the Philadelphia Police Department. At that time, McCaffery lived in the Bustleton area of northeast Philadelphia, a working-class neighborhood considered very conservative with plenty of racial tension brewing just beneath the surface. Known for riding his Harley-Davidson to work with a pistol on his hip, McCaffery consciously shaped his cavalier, **pro-cop persona**. A thirty-three-year military veteran at the time, McCaffery served as an active colonel in the U.S. Air Force.<sup>4</sup>

**Once it became clear that McCaffery would hear many of the RNC protest cases, legal support activists quickly brought themselves up to speed on how he conducted his courtroom. Attorneys working with R2K Legal gave historical accounts of McCaffery’s tenure on the bench, and direct experience in his courtroom more than filled in the gaps.** An early example of McCaffery’s “kangaroo court” occurred on

One of McCaffery's roles as a Municipal Court judge was to hear all of the cases remanded (downgraded) by the Court of Common Pleas from felonies to misdemeanors. In other words, all of the felony defendants whose charges got reduced to misdemeanors were sent to McCaffery's courtroom. As it turned out, almost all of the forty-three defendants charged with felonies during the RNC protests had their charges reduced to misdemeanors. To make matters worse, McCaffery was also scheduled to try some of the larger group cases.<sup>8</sup> Troubled by the prospect of numerous convictions and jail time, R2K Legal began investigating ways to avoid such an outcome. By November 2000, however, McCaffery had convicted several RNC misdemeanor defendants, handing down months-long jail sentences for what was clearly First Amendment activity. His decisions stood in

## Researching a Pro-police Judge

While R2K Legal was busy trying to locate witnesses, its members also began compiling information to be used in the second recusal motion against McCaffery. The research effort turned out to be fairly easy. McCaffery's connections to the police and their fraternal order lay just beneath the surface. Although it was well known that prior to becoming a judge McCaffery had been a cop for many years, it was less known that his membership in the Fraternal Order of Police (FOP) never lapsed after becoming a Municipal Court judge. Accounts of McCaffery sporting a large FOP ring in court also made their way to R2K Legal.

The FOP had endorsed Governor Bush for president.<sup>12</sup> Meanwhile, its organizational principles were undeniably at odds with what dissidents had been calling for on August 1: an end to the prison industrial complex, to the death penalty, and to police brutality. The FOP characterized itself as "the nation's oldest" police

union and “the world’s largest organization of sworn law enforcement officers, with more than 318,000 members in more than 2,100 lodges.”<sup>13</sup> During an FOP meeting at one of these lodges, McCaffery once acted in his capacity as Municipal Court judge and signed a search warrant for a Philadelphia police officer. This fact was raised in a 1998 court case before Common Pleas Judge Gary S. Glazer, in which Glazer commented that McCaffery’s conduct failed to exemplify “a neutral detached magistrate.”<sup>14</sup> Glazer further stated in his ruling that McCaffery represented “a judicial problem,” and “to have a judge sign a warrant at an FOP meeting ... [is] a very bad situation, totally inappropriate and it is not going to pass unnoticed.”<sup>15</sup> R2K Legal was able to obtain the trial transcript and the ruling in order to use them in the *pro se* motion.

McCaffery was on the Philadelphia police force when Mumia Abu-Jamal was accused of killing Daniel Faulkner, a fellow cop. But it was McCaffery’s role as Grand Marshall of the May 2000 “Daniel Faulkner Memorial Motorcycle Run” that best illustrated his pro-cop allegiance and his bias against August 1 protesters. Bikers Allied to Commemorate Uniformed Police, Inc. (BAC-UP) organized the memorial fundraiser.<sup>16</sup> Notably, BAC-UP scheduled its “presentation ceremonies” for August 1, the same day that planned demonstrations were set to occur in support of Mumia Abu-Jamal.

Research by R2K Legal also uncovered a case involving McCaffery and Reverend James Luther Bevel, a one-time aide to Martin Luther King Jr. who had a history of engaging in civil disobedience. In July 1995, Bevel was arrested in

Philadelphia “trying to hold a prayer meeting with 40 others for death row inmate Mumia Abu-Jamal in front of Common Pleas Judge Albert F. Sabo’s home.”<sup>17</sup> McCaffery, who was Bevel’s judge, found him and the other civil disobedient protesters guilty of obstruction of justice and criminal conspiracy.<sup>18</sup> After appealing to the Court of Common Pleas, none of McCaffery’s convictions against the group were upheld. The legal collective felt that McCaffery’s stance toward Bevel and the issue he was protesting underscored his contempt for Abu-Jamal and civil disobedience as a means to foment social change.

As the recusal hearing approached, R2K Legal set out to find RNC defendants who were capable of arguing the motion in a hostile environment. One of the choices was obvious: Danielle Redden. A recent graduate of Villanova University and arrested on August 1, Redden had dedicated much of her life to R2K Legal and the effort to support her fellow defendants. Arrested with dozens of others at 15th and JFK, and scheduled to be tried by McCaffery, Redden was willing to stick her neck out and argue a controversial motion before an inimical judge.

So that Redden would not have to face McCaffery alone, and to improve the odds of squaring off against him, the legal collective set out to find a second *pro se* defendant. Although the selection process was harder than with Redden, the collective eventually settled with confidence on Mark Rifkin. A graduate English student at the time and a member of ACT UP Philadelphia, Rifkin was arrested with Redden at 15th and JFK. Unlike Redden, however, Rifkin’s arrest was unplanned and unintentional. A death in the family had prevented Rifkin from being involved in

protest organizing efforts, and he hadn't intended to participate in any of the demonstrations. On the afternoon of August 1, he was watching *Oprah*, when the local news interrupted the program to show a scene near City Hall a few blocks from his home. Friends of Rifkin appeared on the screen, as he saw fellow ACT UP members being tackled and assaulted by police. "I can't just sit here and watch this on fucking TV," Rifkin thought as he grabbed his bag and ran out the door. Imagining his presence as a witness might discourage the police from acting violently, he ended up in a large crowd where he watched demonstrators get arrested.

As the cops pushed the crowd back, Rifkin chose to resist. Frustrated by having to endure cops telling him where he could and couldn't go, Rifkin refused to move. As the cops continued shoving people, they told him that if he didn't move he'd be arrested. In response to his resistance, Rifkin was tackled and dragged away. Rifkin was not made aware of the reason for his arrest until long after his release. Eventually, he was charged with spray-painting public property. In addition to his strongly held political principles, Rifkin was an eloquent writer and an articulate spokesperson, making him an ideal *pro se* candidate.

Redden and Rifkin filed their recusal motion on January 16, the same day that McCaffery was scheduled to hear the Defender Association motion. Legal activists worked furiously until the final hour. Had there been more time, more pressure could have been put on UPenn to supply the names of witnesses. Getting anyone to corroborate Kevin Vaughan's statement was critically important to ensuring media

## Crashing the Party, Legacies and Lessons from the RNC 2000 – Kris Hermes

coverage and a solid case against McCaffery. Still, the *pro se* motion included many hard-hitting accusations against McCaffery that not only laid the framework for his recusal but also threatened to damage his reputation. R2K Legal members knew that if they could make the accusations stick, the impact could be significant.

The *pro se* recusal motion included some of the same case law references found in the Defender Association motion. What differentiated the *pro se* motion, however, was the additional evidence showing McCaffery's pro-cop bias. The *pro se* motion stated that "McCaffery's actions in the Disla case [where he signed a warrant at an FOP meeting], his longtime service as a police officer, his tenure as a police officer during both Daniel Faulkner's murder and the trial of Mumia Abu-Jamal, his comments denying the First Amendment rights of RNC protestors in the Matthews case, and his history of questionable convictions of those who participate in civil disobedience together reasonably suggest that he may bear a particular animus against the RNC defendants given the specific nature of their protest and the content of their speech and be incapable of ruling fairly."<sup>19</sup> The motion continued to argue that McCaffery's statements in the Matthews case and his ruling against Reverend Bevel cause him to hear the facts of the RNC cases "within a preexisting prejudice that inhibits his ability to consider these cases on their own merits" and to "suggest a pattern of ruling against those who participate in civil disobedience."

Rifkin shot back: "If we had knowledge of other justices' actions and statements," suggesting bias against "the content of what we were protesting we would also be in their courtrooms arguing for a recusal." Rifkin then expounded on the main points in the motion by arguing that "if we had facts including the fact that other justices had been members of the police force, were currently members of the Fraternal Order of Police, had signed warrants at the meetings of the Fraternal Order of Police, had in fact been Grand Marshall in the memorial bike ride for Daniel Faulkner ... if you have those facts in the case of other justices, yes, absolutely we would be in their courtrooms filing for a recusal."

and, in so doing, limits the rights of defendants. Persons convicted at their bench trial have the right to appeal the ruling and demand a second trial, by either judge or jury, in the Court of Common Pleas.

9. From the Motion for Recusal filed on behalf of George Ripley and others similarly situated, Defender Association of Philadelphia, January 4, 2001.
10. See: Letter from attorney Bradley Bridge of the Defender Association of Philadelphia to Municipal Court Judge Seamus McCaffery, January 9, 2001.
11. Greg Richards, "Judge's Comments at Penn Coming Back to Haunt Him," *Daily Pennsylvanian*, January 18, 2001, <http://www.dailypennsylvanian.com/node/22126>.
12. "Governor Bush Accepts Fraternal Order of Police Endorsement in Philadelphia," news release. Fraternal Order of Police, September 20, 2000, <http://www.grandlodgefop.org/press/pr000920a.html> (as of January 2006).
13. See: <http://www.grandlodgefop.org>.
14. From hearing transcript in *Commonwealth v. Disla*, November 11, 1998.
15. From ruling by Common Pleas Court Judge Gary S. Glazer in *Commonwealth v. Disla*. November 13, 1998.
16. "Bikers Donate \$40 G to Nonprofit Organizations That Support Police," press release, Bikers Allied to Commemorate Uniformed Police, Inc., prior to August 1, 2000 (date unknown).
17. "Minister Arrested," *Associated Press*, July 17, 1995.
18. See: *Commonwealth v. Bevel*, (PA, MC# 9507-1663 and PA, CP# 9601-0915)
19. See: Motion for Recusal in *Commonwealth of Pennsylvania v. Mark Rifkin, Danielle Redden*, January 16, 2001.
20. From notes taken by R2K Legal members during court proceeding, January 16, 2001.
21. From notes taken by R2K Legal members and excerpts from transcript of court

**EXHIBIT U**

**Non-Violent  
Direct Action  
@ The Republican  
National Convention**

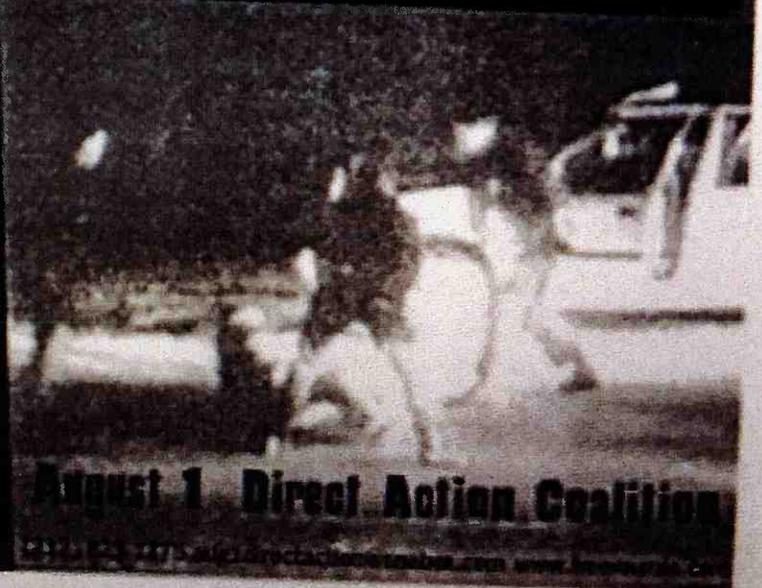
**Against The  
CRIMINAL  
INJUSTICE  
SYSTEM**

**Free Mumia Abu Jamal  
and All Political Prisoners**  
Abolish the Prison Industrial Complex.  
Abolish the Death Penalty  
**Stop Police Violence**  
Power to Our Communities.  
End the Corporate War on the Poor



**Aug. 1  
Philadelphia**

Join the work of activists at the RNC July 28 to Aug 1



**August 1 Direct Action Coalition**

Endorsements (list in formalist): Brecht Forum, Boston DAF, Campaign to End the Death Penalty, Center for Campus Organizing, Coalition for the Human Rights of Immigrants, Coalition Against Anti Asian Violence, Committee in Solidarity with the Peoples of El Salvador, Direct Action Network - NYC, Free Mumia Abu-Jamal Coalition, Graduate Student Employees Union / CWA Local 1180, IBD Movement for Democracy and Education, Pennsylvania Abolitionists, Philadelphia Direct Action Group, Student Liberation Action Movement, US Tibet Committee, United Students Against Sweatshops, War Resisters League, Western Mass Resistance Coalition, Youth Peace.

# **EXHIBIT V**

# “WE SHUT THE CITY DOWN”

Six former Student Liberation Action Movement (SLAM) members reflect on the **mass direct actions against the 2000 RNC in Philadelphia**



## What inspired you to participate in R2K?

The year before R2K, there was the Battle of Seattle. And before that, the stuff that was happening with SLAM was happening nationally. There was a huge upswing in student activism, and there was a huge interest in anarchism and direct action. And 2000 was an election year. The Republican National Convention decided to hold their convention in Philadelphia, which was very symbolic for them in terms of "the cradle of liberty." For activists, we know Philadelphia as the place of Frank Rizzo parading Black Panthers naked in the streets at gunpoint. We know Philadelphia as Wilson Goode dropping a bomb on the MOVE center and destroying entire square blocks in the Black community. We know Philadelphia as the place Mumia, a journalist, writer and educator, was framed for murder and placed on death row. So to see the Republicans going to Philadelphia - many of us took it as a direct challenge to us to bring those politics around prisons and political prisoners to the forefront of the national consciousness.

# **EXHIBIT W**

# DEFEND THE RNC 420

**WE LOVE YOU SISTERS! WE LOVE YOU BROTHERS!\***

Over 400 people were arrested while protesting at the 2000 Republican National Convention (RNC) in Philadelphia, PA. This website provides information on their legal situation and the issues they are protesting.

WWW.R2KLEGAL.ORG

## Home

[Breaking News](#)  
[Breaking News Archive](#)

## R2K Legal

[Civil Suits](#)  
[Friends of Camilo](#)  
[Lawyers](#)  
[Legal FAQ](#)  
[Legal Forms](#)  
[Legal Statistics](#)  
[Legal Timeline](#)

[Legal Updates](#)  
[Mayor/DA Contact](#)

[Press Releases](#)

R2K Legal Contact?  
[info@r2klegal.org](mailto:info@r2klegal.org)

Also see [Local Support](#) for contacts in your area.

## Calendar

You can [post](#) trial dates, events, meetings, etc. on the [R2K calendar](#).

## Local Support

Support groups are in the following areas:

Arcata, CA  
Boston, MA  
Connecticut  
New Jersey  
New York, NY  
Philadelphia, PA

## About Us: [Background](#)

### Background

The political process is morally bankrupt. Both the Republican and Democratic parties neglect the interests of poor and working people and cater to the large business interests who fund their campaigns. These interests have used the parties to block environmental initiatives and roll back people's welfare programs while increasing corporate welfare programs. Average citizens who have suffered the consequences of these changes realize that they have less access than ever to the political process. Many people have responded by choosing not to vote. By protesting the convention, the R2K Network is sending a message that those who reject the two party farce are neither apathetic nor passive. Protesting this convention is a demand for political accountability, radical democratic action and an end to policies that hurt people and the environment.

The protests in Philadelphia have been enthusiastically joined by thousands who intend to address the hearts and minds of the national populace with these problems while politicians rub elbows with the corporate lobbyists who ply them with lavish dinners and fundraising events behind closed doors.

For more background, see the following:

- [The Colombia Plan: April 2000](#), by Noam Chomsky (the war on drugs, corporate influence on foreign policy)
- [The Empire Strikes Back: Police Repression of Protests from Seattle to LA](#) (PDF: 200k), by Paul Rosenberg, [LA Indymedia](#)
- [On the Question of Purpose](#), by kk, philadelphia radical surrealist front
- [Touring the Real Philly](#), by Jennifer Bleyer, Kensington Welfare Rights Union
- [The 2000 U.S. Presidential Elections and the Anti-Imperialist Left: Dilemmas, Hard Choices, Opportunities](#), by Lian Hurst Mann and Eric Mann, [Ahoranow](#)
- [Walkin' in the Shadow of Death](#), by Mumia Abu-Jamal (other articles and columns by Mumia and death penalty info)

Notice: All information is subject to change, it's your responsibility to confirm with [R2K Legal](#).

[previous r2klegal.org](#)

## About Us

Who are we? The R2K Network. Why are we protesting? Here's some [background](#).

[Add yours...](#)

## Donate

Please help support our Legal Fund for Camille and the Timoney 3 cases. To make a donation, contact: [info@r2klegal.org](mailto:info@r2klegal.org)

## Supporters

Letters of support:

[Activist Organizations](#)  
[AFSCME Union](#)  
[APWU Union](#)  
[First Unitarian Church of Philadelphia](#)  
[Members of Congress](#)

National Association for Socially Responsible Organizations

[Add yours...](#)

R2K Mobilization Links

# **EXHIBIT X**

## Home

[Breaking News](#)

[Breaking News Archive](#)

## R2K Legal

[Civil Suits](#)

[Friends of Camilo](#)

[Lawyers](#)

[Legal FAQ](#)

[Legal Forms](#)

[Legal Statistics](#)

[Legal Timeline](#)

[Legal Updates](#)

[Mayor/DA Contact](#)

[Press Releases](#)

R2K Legal Contact:

[info@r2klegal.org](mailto:info@r2klegal.org)

Also see [Local Support](#) for contacts in your area.

## Calendar

You can [post](#) trial dates, events, meetings, etc. on the [R2K calendar](#).

## Local Support

Support groups are in the following areas:

[Arcata, CA](#)

[Boston, MA](#)

[Connecticut](#)

[New Jersey](#)

[New York, NY](#)

[Philadelphia, PA](#)

[Providence, RI](#)

[Virginia](#)

[Washington, DC](#)

[Add yours...](#)

**R2K Legal:** [Civil Suits](#) | [Friends of Camilo](#) | [Lawyers](#) | [Legal FAQ](#) | [Legal Forms](#) | [Legal Updates](#) | [Press Releases](#)

## Press Releases

### R2K LEGAL COLLECTIVE MEDIA ADVISORY

**FOR IMMEDIATE RELEASE:** November 8, 2000

**CONTACT:** Mac Scott (646) 489-4375, [R2K Legal \(215\) 925-6791](tel:215-925-6791)

<http://www.r2klegal.org>

### PROTESTORS FROM THE REPUBLICAN NATIONAL CONVENTION GO TO TRIAL The Battle Continues

**WHAT:** Press Conference

**WHERE:** Criminal Justice Center, Corner of 13th Street and Filbert

**WHEN:** Wednesday November 8, 2000 at 4:00pm

**WHO:** Lawyer from the Public Defenders Office, Defendant and Community Organizers

(Philadelphia, PA) Today we mark the beginning of the mass trials of over 200 protestors arrested at the Republican National Convention. At the Convention, protestors voiced their disappointment that both political parties were not addressing issues surrounding the United States Criminal INjustice system. Two months after the Convention and right after the elections, our politicians continue to ignore the protestors' voices. Undeterred and arrested on trumped-up and phony charges, protestors and their lawyers will continue to highlight the inequalities of the American Criminal INjustice System even if our politicians continue to ignore them.

**During the Republican National Convention, thousands of people took to the streets demanding:**

**FREEDOM FOR MUMIA ABU-JAMAL AND ALL POLITICAL PRISONERS**

**ABOLISH THE DEATH PENALTY**

**ABOLISH THE PRISON INDUSTRIAL COMPLEX**

**STOP POLICE TERROR**

**END THE CORPORATE WAR ON THE POOR**

**POWER TO OUR COMMUNITIES**

**As protestors head to trial, they reissue these demands** and reaffirm their commitment to protest until our voices are heard. They stand in solidarity with all people that have been brutalized, exploited and criminalized by the Criminal INjustice system and forgotten by the politicians.

Notice: All information is subject to change, it's your responsibility to confirm with [R2K Legal](#).

[previous.r2klegal.org](http://previous.r2klegal.org)

## About Us

Who are we? The R2K Network. Why are we protesting? Here's some [background](#).

[Add yours...](#)

## Donate

Please help support our Legal Fund for Camille and the Timoney 3 cases. To make a donation, contact: [info@r2klegal.org](mailto:info@r2klegal.org)

## Supporters

Letters of support:

[Activist Organizations](#)

[AFSCME Union](#)

[APWU Union](#)

[First Unitarian Church of Philadelphia](#)

[Members of Congress](#)

[National Association for Socially Responsible Organizations](#)

[Add yours...](#)

R2K Mobilization Links:

[Ad Hoc Committee to Defend Health Care](#)  
[shillyhealth.org](#)

[August 1st Direct Action Coalition](#)

[Kensington Welfare Rights Union](#)

# **EXHIBIT Y**



# DEFEND THE RNC 420

**WE LOVE YOU SISTERS! WE LOVE YOU BROTHERS!\***

Over 400 people were arrested while protesting at the 2000 Republican National Convention (RNC) in Philadelphia, PA. This website provides information on their legal situation and the issues they are protesting.

## Home

- [Breaking News](#)
- [Breaking News Archive](#)

## R2K Legal

- [Civil Suits](#)
- [Friends of Camilo](#)
- [Lawyers](#)
- [Legal FAQ](#)
- [Legal Forms](#)
- [Legal Statistics](#)
- [Legal Timeline](#)
- [Legal Updates](#)
- [Mayor/DA Contact](#)
- [Press Releases](#)
- R2K Legal Contact:  
[info@r2klegal.org](mailto:info@r2klegal.org)
- Also see [Local Support](#) for contacts in your area.

## Calendar

You can [post](#) trial dates, events, meetings, etc. on the [R2K calendar](#).

## Local Support

- Support groups are in the following areas:
- Arcata, CA
  - Boston, MA
  - Connecticut
  - New Jersey

**Media Coverage:** [Corporate Media](#) | [Independent Media](#) | [Letters to the Editor](#) | [Media Sign-up](#)

## Philadelphia: 1st Amendment Free Zone!

**12/21/00 - by Mumia Abu-Jamal, M.A. - Column #486**

A mere mention of the place-name "Philadelphia" is sufficient to evoke a host of images upon the mind, a mix of myth and mayhem; the differences between what one is taught, and what one has learned from the lessons of life.

To many, Philadelphia means the Liberty Bell, Independence Hall, and the staging ground for what came to be called the American Revolution. To others, Philadelphia means the MOVE bombing, unbridled police repression, the flames of Osage Avenue, marking signs of a Revolution to come. Philadelphia, in fact, was the first capital of the fledgling United States. It was also, in the eyes of those most deprived of freedom, ex-slaves like Frederick Douglass, a city remarkable for its racism, and a dangerous city, that spawned mobs who burned buildings which were centers of abolitionism. More recently, in 1999 and the year 2000, it has been the place where the New Abolitionists - opponents of the death penalty - have found the hard face of police and judicial oppression turned against them. Demonstrators who have dared to exercise their alleged first amendment rights at the Liberty Bell have learned that such an exercise is a crime, punished by judicially-imposed silence, and banishment from the environs where the so-called "constitutional guarantee" was written! Those bold youth who dared to practice those alleged "constitutional guarantees" at the recent Republican National Convention in Philadelphia found Philadelphia's real face: the dungeons of Holmesburg Prison, the vomit-strewn holding tanks of the Roundhouse, and the malevolent repression of the DA's Office, which sought, and obtained, million dollar ransoms, for those who got the legal equivalent of traffic tickets. Welcome to Philadelphia, y'all.

Revolutionary journalist C. Clark Kissinger has been but the latest to taste the tender mercies of the local judiciary. Banned from the city for daring to act as if the Liberty Bell represented liberty, Clark was recently hauled before a magistrate for - get this - speaking in Philadelphia during the Convention. For speaking, without first getting judicial permission (that is, for practicing free speech!) Clark was sentenced to 90 days in federal prison.

Notice: All information is subject to change, it's your responsibility to confirm with [R2K Legal](#).  
[previous r2klegal.org](#)

## About Us

Who are we? The R2K Network. Why are we protesting? Here's some [background](#).  
[Add yours...](#)

## Donate

Please help support our Legal Fund for Camille and the Timoney 3 cases. To make a donation, contact: [info@r2klegal.org](mailto:info@r2klegal.org)

## Supporters

- Letters of support:
- [Activist Organizations](#)
  - [AFSCME Union](#)
  - [APWU Union](#)
  - [First Unitarian Church of Philadelphia](#)
  - [Members of Congress](#)
  - National Association for Socially Responsible Organizations
  - [Add yours...](#)

# **EXHIBIT Z**

**United States District Court  
Eastern District of Pennsylvania (Philadelphia)  
CIVIL DOCKET FOR CASE #: 2:99-cv-05089-WY**

**ABU-JAMAL, et al v. HORN, et al**

Assigned to: JUDGE WILLIAM H. YOHN, JR

Demand: \$0

Case in other court: 00-09007

01-09014

02-09001

Cause: 28:2254dp Petition for Writ of Habeas Corpus (DEATH  
PENALTY)

Date Filed: 10/15/1999

Date Terminated: 12/18/2001

Jury Demand: None

Nature of Suit: 535 Habeas Corpus: Death  
Penalty

Jurisdiction: Federal Question

**Petitioner**

**MUMIA ABU-JAMAL**

*also known as*

**WESLEY COOK**

represented by **DANIEL R. WILLIAMS**  
CAPITAL DEFENDER OFFICE  
915 BROADWAY, 7TH FLOOR  
NEW YORK, NY 10010  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**ELIOT LEE GROSSMAN**  
LAW OFFICE OF ELIOT LEE  
GROSSMAN  
248 EAST MAIN STREET  
SUITE 100  
ALHAMBRA, CA 91801  
TEL 626-943-1945  
Fax: FAX 626-943-1945  
*TERMINATED: 10/14/2003*  
*LEAD ATTORNEY*

**J. MICHAEL FARRELL**  
718 ARCH STREET  
SUITE 402N  
PHILADELPHIA, PA 19106-1530  
215-925-1105  
Email: mike@farrelltrial.com  
*TERMINATED: 10/14/2003*  
*LEAD ATTORNEY*

**JULES EPSTEIN**  
**KAIRYS RUDOVSKY MESSING &  
FEINBERG LLP**  
THE CAST IRON BLDG STE 501 SOUTH  
718 ARCH STREET  
PHILADELPHIA, PA 19106  
215-925-4400  
Email: jepstein@krlawphila.com

*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**LEONARD I. WEINGLASS**  
6 WEST 20TH STREET  
SUITE 10A  
NEW YORK, NY 10011  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**MARLENE KAMISH**  
2927 W. LIBERTY AVE. #193  
PITTSBURGH, PA 15216-2525  
TEL 412-417-3735  
*TERMINATED: 10/14/2003  
LEAD ATTORNEY*

**MARLENE KAMISH**  
P.O. BOX 08376  
CHICAGO, IL 60608  
TEL 312-455-0766  
*TERMINATED: 10/14/2003  
LEAD ATTORNEY*

**NICK BROWN**  
LINCOLN'S INN  
4 NEW SQUARE  
LONDON WC2A 3RJ  
UNITED KINGDOM  
TEL 0207-822-2000  
*TERMINATED: 05/30/2001  
LEAD ATTORNEY*

**STEVEN W. HAWKINS**  
1436 U STREET, N.W.  
SUITE 104  
WASHINGTON, DC 20009  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**Petitioner**

**AMERICAN CIVIL LIBERTIES  
UNION**

represented by **EARL W. TRENT , JR.**  
NATIONAL ASSOCIATION FOR  
ADVANCEMENT OF COLORED  
PEOPLE  
PHILADELPHIA BRANCH  
1514 W. CECIL B. MOORE AVENUE  
PHILA, PA 19121  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**KARL BAKER**  
AMERICAN CIVIL LIBERTIES UNION  
P.O. BOX 1161

125 SOUTH NINTH STREET  
SUITE 701  
PHILA, PA 19105-1161  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Petitioner**

**NATIONAL ASSOCIATION**  
*NATIONAL ASSOCIATION FOR THE*  
*ADVANCEMENT OF COLORED PEOPLE*

represented by **EARL W. TRENT , JR.**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**KARL BAKER**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Petitioner**

**FOR CHICANA/CHICANO STUDIES**  
**FOUNDATION**

represented by **ELIOT LEE GROSSMAN**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**MARLENE KAMISH**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**MICHAEL COARD**  
MELLON CENTER SUITE 3750  
1735 MARKET ST  
PHILADELPHIA, PA 19103  
215-552-8714  
Email: michaelcoard@msn.com  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Petitioner**

**JEREMY CORBYN**

represented by **MICHAEL COARD**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**NICK BROWN**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Petitioner**

**NEIL GERRARD**

represented by **MICHAEL COARD**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**NICK BROWN**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Petitioner**

**ALICE MAHON**

represented by **MICHAEL COARD**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**NICK BROWN**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Petitioner**

**VINCENT CABLE**

represented by **MICHAEL COARD**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**NICK BROWN**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Petitioner**

**JOHN. AUSTIN**

represented by **MICHAEL COARD**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**NICK BROWN**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Petitioner**

**MARTIN CATON**

represented by **MICHAEL COARD**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**NICK BROWN**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Petitioner**

**KELVIN HOPKINS**

represented by **MICHAEL COARD**  
(See above for address)

*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**NICK BROWN**  
(See above for address)  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**Petitioner**

**OONA KING**

represented by **MICHAEL COARD**  
(See above for address)  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**NICK BROWN**  
(See above for address)  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**Petitioner**

**JOHN MCDONNELL**

represented by **MICHAEL COARD**  
(See above for address)  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**NICK BROWN**  
(See above for address)  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**Petitioner**

**IAIN COLEMAN**

represented by **MICHAEL COARD**  
(See above for address)  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**NICK BROWN**  
(See above for address)  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**Petitioner**

**ANDREW DISMORE**

represented by **MICHAEL COARD**  
(See above for address)  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**NICK BROWN**  
(See above for address)  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**Petitioner**

**ROBERT WAREING**

represented by **MICHAEL COARD**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**NICK BROWN**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Petitioner**

**DEREK WYATT**

represented by **MICHAEL COARD**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**NICK BROWN**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Petitioner**

**BILL ETHERINGTON**

represented by **MICHAEL COARD**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**NICK BROWN**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Petitioner**

**ANN CRYER**

represented by **MICHAEL COARD**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**NICK BROWN**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Petitioner**

**RUDI VIS**

represented by **MICHAEL COARD**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**NICK BROWN**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Petitioner**

**SIMON THOMAS**

represented by **MICHAEL COARD**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**NICK BROWN**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Petitioner**

**FABIAN HAMILTON**

represented by **MICHAEL COARD**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**NICK BROWN**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Petitioner**

**PIARA S. KHABRA**

represented by **MICHAEL COARD**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**NICK BROWN**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Petitioner**

**STEPHEN LADYMAN**

represented by **MICHAEL COARD**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**NICK BROWN**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Petitioner**

**NICK PALMER**

represented by **MICHAEL COARD**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**NICK BROWN**  
(See above for address)

*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**Petitioner**

**PHIL SAWFORD**  
*ALL MEMBERS OF THE BRITISH  
PARLIAMENT*

represented by **MICHAEL COARD**  
(See above for address)  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**NICK BROWN**  
(See above for address)  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

V.

**Respondent**

**MARTIN HORN**  
*PENNSYLVANIA DIRECTOR OF  
CORRECTIONS;*

represented by **DONNA G. ZUCKER**  
1421 ARCH STREET  
PHILA, PA 19102-1576  
TEL 215-686-5703  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**HUGH J. BURNS , JR.**  
DISTRICT ATTORNEY'S OFFICE  
3 SOUTH PENN SQUARE  
PHILA, PA 19107  
215-686-5730  
Email: hburns@attorneygeneral.gov  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**Respondent**

**CONNER BLAINE**  
*SUPERINTENDENT, SCI GREENE*

represented by **DONNA G. ZUCKER**  
(See above for address)  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**HUGH J. BURNS , JR.**  
(See above for address)  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**Respondent**

**DISTRICT ATTORNEY FOR  
PHILADELPHIA COUNTY**

represented by **DONNA G. ZUCKER**  
(See above for address)  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**HUGH J. BURNS , JR.**  
(See above for address)

*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**Respondent**

**THE ATTORNEY GENERAL OF THE  
STATE OF PENNSYLVANIA**

represented by **DONNA G. ZUCKER**  
(See above for address)  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**HUGH J. BURNS , JR.**  
(See above for address)  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**Petitioner**

**THE CENTER FOR HUMAN RIGHTS  
AND CONSTITUTIONAL LAW**

represented by **JOSEPH Z. TRAUB**  
RAYNES MCCARTY  
1845 WALNUT STREET  
20TH FLOOR  
PHILADELPHIA, PA 19103  
215-568-6190  
Fax: 215-988-0618  
Email: [jztraub@raynesmccarty.com](mailto:jztraub@raynesmccarty.com)  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**Petitioner**

**INTERNATIONAL ASSOCIATION OF  
DEMOCRATIC LAWYERS**

represented by **JOSEPH Z. TRAUB**  
(See above for address)  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**Petitioner**

**NATIONAL CONFERENCE OF  
BLACK LAWYERS**

represented by **JOSEPH Z. TRAUB**  
(See above for address)  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**Petitioner**

**NATIONAL LAWYERS GUILD**

represented by **JOSEPH Z. TRAUB**  
(See above for address)  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**Petitioner**

**PRISONERS SELF HELP LEGAL  
CLINIC**

represented by **JOSEPH Z. TRAUB**  
(See above for address)  
*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

**Petitioner**

**SOUTHERN POVERTY LAW CENTER**

represented by **JOSEPH Z. TRAUB**  
(See above for address)

*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

<b>Date Filed</b>	<b>#</b>	<b>Docket Text</b>
10/15/1999	1	Petition for writ of habeas corpus . filing fee \$ 5.00 receipt # 713971 (lvj) (Entered: 10/15/1999)
10/15/1999	2	EMERGENCY MOTION BY PETITIONER MUMIA ABU-JAMAL TO STAY OF EXECUTION AND CONSOLIDATED MEMORANDUM OF LAW , CERTIFICATE OF SERVICE. (lvj) (Entered: 10/15/1999)
10/15/1999	3	Copy of certificate of death penalty (original to USCA) (lvj) (Entered: 10/15/1999)
10/15/1999		Habeas Corpus Case Management Track. (lvj) (Entered: 10/15/1999)
10/26/1999	4	MOTION BY PETITIONER MUMIA ABU-JAMAL FOR PRO HAC VICE ADMISSION ,AFFIDAVITS IN SUPPORT, CERTIFICATE OF SERVICE. (lvj) (Entered: 10/26/1999)
10/26/1999	5	ORDER THAT PETITIONER'S MOTION FOR STAY OF EXECUTION IS GRANTED AND HIS EXECUTION IS STAYED PENDING DISPOSITION OF THIS PETITION BY THIS COURT. ( SIGNED BY JUDGE WILLIAM H. YOHN JR. ) 10/26/99 ENTERED AND COPIES MAILED AND FAXED. (lvj) (Entered: 10/26/1999)
10/26/1999	6	Minute entry dated 10/26/99 hearing: court colloquy's with counsel, court adjourns. (lvj) (Entered: 10/27/1999)
10/27/1999	7	ORDER THAT THE CLERK OF THE QUARTER SESSIONS COURT OF PHILA SHALL FILE WITH THE CLERK OF THIS COURT ALL RECORDS, ETC. WITHIN TWENTY DAYS FROM THE DATE OF THIS ORDER. ( SIGNED BY JUDGE WILLIAM H. YOHN JR. ) 10/27/99 ENTERED AND COPIES MAILED. (lvj) (Entered: 10/27/1999)
10/27/1999	8	ORDER THAT PETITIONER SHALL SERVE A COPY OF THE PETITION UPON THE ATTORNEY GENERAL OF PA WITHIN TEN DAYS OF THE DATE THEREOF. PETITIONER SHALL FILE HIS LEGAL MEMORANDUM IN SUPPORT OF THE PETITION ON OR BEFORE 12/7/99 ETC. THE RESPONDENTS SHALL FILE THEIR FACTUAL AND LEGAL RESPONSE TO THE PETITIONER'S PETITION AND LEGAL MEMORANDUM ON OR BEFORE 2/7/00, ETC. PETITIONER MAY FILE A TRAVERSE ON OR BEFORE 2/27/00. THE COURT WILL THEREAFTER SCHEDULE ORAL ARGUMENT ON THE ISSUES RAISED, ETC. THE PARTIES AND THE COURT WILL ADVISE ANY PERSONS WHO DESIRE TO WRIT LETTERS IN SUPPORT OF THE PETITIONER TO SEND THOSE LETTERS TO PETITIONER'S COUNSEL, ETC. ( SIGNED BY JUDGE WILLIAM H. YOHN JR. ) 10/27/99 ENTERED AND COPIES MAILED. (lvj) (Entered: 10/27/1999)
10/28/1999	9	ORDER THAT LEONARD WEINGLASS, ESQ. AND DANIEL WILLIAMS BE AND ARE HEREBY ADMITTED PRO HAC VICE, ETC.. (SIGNED BY JUDGE WILLIAM H. YOHN JR.) 10/28/99 ENTERED AND COPIES MAILED. (fb) (Entered: 10/28/1999)
10/29/1999	10	Entry of Appearance of DONNA G. ZUCKER for RESPONDENT MARTIN HORN, RESPONDENT CONNER BLAINE, RESPONDENT DA FOR PHILADELPHIA, RESPONDENT ATTY GEN OF PA. . (lvj) (Entered: 10/29/1999)
11/04/1999	11	Transcript for hearing dated 10/26/99 (lvj) (Entered: 11/04/1999)
11/08/1999	12	SECOND MOTION BY PETITIONER MUMIA ABU-JAMAL FOR PRO HAC VICE

		ADMISSION , AFFIDAVIT, CERTIFICATE OF SERVICE. (lvj) (Entered: 11/08/1999)
11/10/1999	13	ORDER THAT STEVEN HAWKINS BE AND IS HEREBY ADMITTED PRO HAC VICE, ETC. FURTHER ORDER THAT A COPY OF THIS ORDER BE SERVED UPON ALL COUNSEL WITHIN 7 DAYS OF RECEIPT BY COUNSEL FOR PETITIONER. ( SIGNED BY JUDGE WILLIAM H. YOHN JR. ) 11/10/99 ENTERED AND COPIES MAILED. (lvj) (Entered: 11/10/1999)
12/08/1999	14	Memorandum of law by PETITIONER MUMIA ABU-JAMAL in support of habeas corpus relief , Certificate of Service. (lvj) (Entered: 12/09/1999)
12/10/1999	15	Certificate of service by RESPONDENT MARTIN HORN, RESPONDENT CONNER BLAINE, RESPONDENT DA FOR PHILADELPHIA, RESPONDENT ATTY GEN OF PA. that copy of the forgoing letter was served on Leonard I. Weinglass, Esquire (lvj) (Entered: 12/13/1999)
01/18/2000	16	Minute entry dated 1/14/00 re: court colloquy's with counsel; court adjourns (lvj) (Entered: 01/19/2000)
01/20/2000	18	MOTION AND MEMORANDUM BY PETITIONER MUMIA ABU-JAMAL TO REVIEW FOR REASONABLENESS THE STATE COURT'S FINDINGS OF FACT PURSUANT TO 28 U.S.C. SECTION 2254(D)(2) AND THE FIFTH, EIGHTH AND FOURTEENTH AMENDMENTS TO THE U.S. CONSTITUTION , PROOF OF COUNSEL, CERTIFICATE OF SERVICE. (lvj) (Entered: 01/21/2000)
01/21/2000	17	ORDER THAT PETITIONER MAY FILE AN ADDITIONAL LEGAL MEMORANDUM IN SUPPORT OF HIS CONTENTIONS THAT UNREASONABLE FINDINGS OF FACT WERE MADE BY THE STATE COURT AND THAT THE LEGAL PROCESS IN THE STATE COURT WAS INVALID ON OR BEFORE 1/20/00, ETC. RESPONDENTS SHALL FILE THEIR FACTUAL AND LEGAL RESPONSE TO THE PETITIONER'S PETITION, ETC. PEITIONER MAY FILE A TRAVERSE NOT EXCEEDING 25 PAGES IN LENGTH ON OR BEFORE 3/20/00. PETITIONER MAY FILE A MOTION FOR AN EVIDENTIARY HEARING NOT EXCEEDING 20 PAGES IN LENGTH ON OR BEFORE 3/9/00. RESPONDENTS SHALL FILE A RESPONSE THERETO ON OR BEFORE 4/7/00. NO FURTHER FILINGS ARE ANTICIPATED AND NONE SHALL BE PERMITTED ABSENT EXTRAORDINARY CIRCUMSTANCES UNLESS TH COURT ORDERS AN EVIDENTIARY HEARING, ETC. ( SIGNED BY JUDGE WILLIAM H. YOHN JR. ) 1/21/00 ENTERED AND COPIES MAILED . (lvj) (Entered: 01/21/2000)
01/28/2000	19	Transcript for hearing 1/14/00 (lvj) (Entered: 01/31/2000)
02/28/2000	20	Petition of RESPONDENT MARTIN HORN, RESPONDENT CONNER BLAINE, RESPONDENT DA FOR PHILADELPHIA, RESPONDENT ATTY GEN OF PA. for extension of time to file respondents' memorandum of law , Certificate of Service. (lvj) (Entered: 02/29/2000)
03/01/2000	21	ORDER THAT RESPONDENTS' TIME FOR FILING RESPONDENTS' MEMORANDUM OF LAW IS EXTENDED TO 3/3/00. ( SIGNED BY JUDGE WILLIAM H. YOHN JR. ) 3/2/00 ENTERED AND COPIES MAILED . (lvj) (Entered: 03/02/2000)
03/03/2000	22	Response to Petition-writ of habeas corpus by RESPONDENT MARTIN HORN, RESPONDENT CONNER BLAINE, RESPONDENT DA FOR PHILADELPHIA, RESPONDENT ATTY GEN OF PA. , certificate of service. (lvj) (Entered: 03/03/2000)
03/03/2000	23	Memorandum of law by RESPONDENT MARTIN HORN, RESPONDENT CONNER BLAINE, RESPONDENT DA FOR PHILADELPHIA, RESPONDENT ATTY GEN OF

		PA. , Certificate of Service. (lvj) (Entered: 03/03/2000)
03/03/2000	24	Memorandum by RESPONDENT MARTIN HORN, RESPONDENT CONNER BLAINE, RESPONDENT DA FOR PHILADELPHIA, RESPONDENT ATTY GEN OF PA. regarding state court fact , Certificate of Service. (lvj) (Entered: 03/03/2000)
03/03/2000	25	Appendix by RESPONDENT MARTIN HORN, RESPONDENT CONNER BLAINE, RESPONDENT DA FOR PHILADELPHIA, RESPONDENT ATTY GEN OF PA. (lvj) (Entered: 03/03/2000)
03/09/2000	26	ORDER, THE PETITIONERS' TIME FOR FILING A MOTION FOR AN EVIDENTIARY HEARING IS EXTENDED TO 3/16/00 , ETC.. (SIGNED BY JUDGE WILLIAM H. YOHN JR.) 3/10/00 ENTERED AND COPIES MAILED. (fb) (Entered: 03/10/2000)
03/16/2000	27	MOTION BY PETITIONER MUMIA ABU-JAMAL FOR AN EVIDENTIARY HEARING AND MEMORANDUM IN SUPPORT THEREOF , CERTIFICATE OF SERVICE. (gm) (Entered: 03/17/2000)
03/24/2000	28	Petition of PETITIONER AMERICAN CIVIL LIBER, PETITIONER NATIONAL ASSOCIATION for permission for amici curiae to file a memorandum of law in support of petition for writ of habeas corpus, Certificate of Service, Memorandum. (jl) Modified on 07/13/2000 (Entered: 03/24/2000)
03/27/2000	29	Traverse by PETITIONER MUMIA ABU-JAMAL, Certificate of Service. (md) (Entered: 03/28/2000)
03/30/2000	30	Memorandum by RESPONDENT DA FOR PHILADELPHIA, RESPONDENT ATTY GEN OF PA., RESPONDENT CONNOR BLAINE, RESPONDENT MARTIN HORN in opposition to MOTION FOR AN EVIDENTIARY HEARING AND MEMORANDUM IN SUPPORT THEREOF , Certificate of Service. (ldb) Modified on 04/03/2000 (Entered: 03/31/2000)
03/30/2000	31	Response by RESPONDENT DA FOR PHILADELPHIA to petition of putatie amici for petitioner, Certificate of Service. (gn) (Entered: 03/31/2000)
04/03/2000	32	Petition of PETITIONER THE CENTER FOR HUAMN, PETITIONER ASSOC DEMOCRATIC LAW, PETITIONER CONF. BLACK LAWYERS, PETITIONER NATL LAWYERS GUILD, PETITIONER PRISONERS SELF HELP, PETITIONER SOUTHERN POVERTY LAW for permission for Amici Curiae to file a brief in support of Petition for Writ of Habeas Corpus, Certificate of service (Attached) (ph) Modified on 07/13/2000 (Entered: 04/03/2000)
04/26/2000	33	Response by RESPONDENT MARTIN HORN, RESPONDENT CONNER BLAINE, RESPONDENT DA FOR PHILADELPHIA, RESPONDENT ATTY GEN OF PA. to petition of second group of putative amici for petitioner, Certificate of Service. (lvj) (Entered: 04/26/2000)
05/04/2000	34	Notice of change of address by DANIEL R. WILLIAMS (lvj) (Entered: 05/04/2000)
05/05/2000	35	Certificate of service by RESPONDENT MARTIN HORN, RESPONDENT CONNER BLAINE, RESPONDENT DA FOR PHILADELPHIA that copy of letter to Judge Yohn was served by mail (lvj) (Entered: 05/08/2000)
05/12/2000	36	ORDER THAT THE REQUEST TO FILE AN ADDITIONAL BRIEF IS GRANTED AND PETITIOER MAY FILE A SUPPLEMENTAL BRIEF ON OR BEFORE 6/2/00. FURTHER ORDERED THAT THE DEFTS MAY FILE A RESPONSIVE BRIEF ON THOSE ISSUES ONLY ON OR BEFORE 6/23/00. NO REPLY BRIEF SHALL BE

		ALLOWED. ( SIGNED BY JUDGE WILLIAM H. YOHN JR. ) 5/12/00 ENTERED AND COPIES MAILED . (lvj) (Entered: 05/15/2000)
06/01/2000	37	PETITIONER MUMIA ABU-JAMAL supplemental memorandum of law, certificate of service. (lvj) (Entered: 06/01/2000)
06/14/2000	38	Response by RESPONDENT MARTIN HORN, RESPONDENT CONNER BLAINE, RESPONDENT DA FOR PHILADELPHIA, RESPONDENT ATTY GEN OF PA. to petitioner's supplemental brief, Certificate of Service. (lvj) (Entered: 06/15/2000)
06/23/2000	39	Petition of Petitioner Jeremy Corbyn, Neil Gerrard, Alice Mahon, Vincent Cable, John Austin, Martin Caton, Kelvin Hopkins, Oona King, John McDonnell, Iain Coleman, Andrew Dismore, Robert Wareing, Derek Wyatt, Bill Etherington, Ann Cryer, Rudi Vis, Simon Thomas, Fabian Hamilton, Piara S. Khabra, Stephen Ladyman, Nick Palmer, Phil Sawford, all members of the British Parliament for permission for Amici Curiae to file memorandum of law in support of petition for writ of habeas corpus pursuant to 28 U.S.C. 2254, Certificate of Service. (Memorandum of Law attached) (md) Modified on 07/13/2000 (Entered: 06/26/2000)
06/28/2000	40	Amicus Curiae Petition of PETITIONER FOR CHICANA/CHICANO for leave to file amicus curiae brie in support of petition for writ of habeas corpus, Proof of Service. (Brief of Amicus Curiae attached). (fb) Modified on 07/13/2000 (Entered: 06/28/2000)
06/30/2000	41	Response by RESPONDENT ATTY GEN OF PA., RESPONDENT DA FOR PHILADELPHIA, RESPONDENT CONNER BLAINE, RESPONDENT MARTIN HORN to petition of fourth putative amicus for petitioner, Certificate of Service. (lvj) (Entered: 07/05/2000)
06/30/2000	42	Response by RESPONDENT ATTY GEN OF PA., RESPONDENT DA FOR PHILADELPHIA, RESPONDENT CONNER BLAINE, RESPONDENT MARTIN HORN to petition of third group of putative amici for petitioner, Certificate of Service. (lvj) (Entered: 07/05/2000)
06/30/2000	43	ORDER THAT THE PROTHONORARY OF THE SUPREME COURT OF PA SHALL FILE FILE WITH THE CLERK OF THIS COURT ALL RECORDS, ETC. WITHIN TWENTY DAYS OF THE DATE OF THIS ORDER. ( SIGNED BY JUDGE WILLIAM H. YOHN JR. ) 7/5/00 ENTERED AND COPIES MAILED. (lvj) (Entered: 07/05/2000)
07/06/2000		State Court Record received and forwarded to Judge Yohn. (5 boxes). (lvj) (Entered: 07/06/2000)
07/10/2000	44	Response of amaicus curiae for PETITIONER CHICANA/CHICANO to opposition of responents horn, et al to petition for leave to file amicus brief, Certificate of Service. (lvj) Modified on 07/13/2000 (Entered: 07/11/2000)
07/10/2000	45	Response OF PETITIONER JEREMY CORBYN, PETITIONER NEIL GERRARD, PETITIONER ALICE MAHON, PETITIONER VINCENT CABLE, PETITIONER JOHN. AUSTIN, PETITIONER MARTIN CATON, PETITIONER KELVIN HOPKINS, PETITIONER OONA KING, PETITIONER JOHN MCDONNELL, PETITIONER IAIN COLEMAN, PETITIONER ANDREW DISMORE, PETITIONER ROBERT WAREING, PETITIONER DEREK WYATT, PETITIONER BILL ETHERINGTON, PETITIONER ANN CRYER, PETITIONER RUDI VIS, PETITIONER SIMON THOMAS, PETITIONER FABIAN HAMILTON, PETITIONER PIARA S. KHABRA, PETITIONER STEPHEN LADYMAN, PETITIONER NICK PALMER, PETITIONER PHIL SAWFORD to opposition of respondents Horn, etal to petition for permission to file an amicus brief, proof of Service. (lvj) (Entered: 07/12/2000)
07/11/2000	46	APPLICATION of PETITIONER MUMIA ABU-JAMAL for leave to amend the petition

		for habeas corpus relief, certificate of service. (petitioner's proposed amendment to the petition for habeas corpus is attached) (lvj) (Entered: 07/12/2000)
07/12/2000	47	Certificate of service by RESPONDENT ATTY GEN OF PA., RESPONDENT DA FOR PHILADELPHIA, RESPONDENT CONNER BLAINE, RESPONDENT MARTIN HORN (lvj) (Entered: 07/13/2000)
07/19/2000	48	Answer by RESPONDENT ATTY GEN OF PA., RESPONDENT DA FOR PHILADELPHIA, RESPONDENT CONNER BLAINE, RESPONDENT MARTIN HORN to petitioner's application to amend habeas corpus petition, Certificate of Service. (lvj) (Entered: 07/20/2000)
08/01/2000	49	Response (reply memorandum) by PETITIONER MUMIA ABU-JAMAL to Commonwealth's answer to petitioner's application to amend habeas corpus petition, Certificate of Service. (gm) (Entered: 08/01/2000)
08/07/2000	50	MEMORANDUM AND ORDER THAT THE FOUR PETITIONS OF AMICI CURIAE FOR PERMISSION TO FILE LEGAL MEMORANDA IN SUPPORT OF A PETITION FOR WRIT OF HABEAS CORPUS IS DENIED. ( SIGNED BY JUDGE WILLIAM H. YOHN JR. ) 8/7/00 ENTERED AND COPIES . (lvj) (Entered: 08/07/2000)
08/09/2000	51	MOTION BY RESPONDENT ATTY GEN OF PA., RESPONDENT DA FOR PHILADELPHIA, RESPONDENT CONNER BLAINE, RESPONDENT MARTIN HORN TO STRIKE "REPLY MEMORANDUM TO COMMONWEALTH'S ANSWER TO PETITIONER'S APPLICATION TO AMEND HABEAS CORPUS PETITION" , CERTIFICATE OF SERVICE. (fb) (Entered: 08/10/2000)
09/05/2000	52	MOTION BY PETITIONER FOR CHICANA/CHICANO, PETITIONER JEREMY CORBYN, PETITIONER NEIL GERRARD, PETITIONER ALICE MAHON, PETITIONER VINCENT CABLE, PETITIONER JOHN. AUSTIN, PETITIONER MARTIN CATON, PETITIONER KELVIN HOPKINS, PETITIONER OONA KING, PETITIONER JOHN MCDONNELL, PETITIONER IAIN COLEMAN, PETITIONER ANDREW DISMORE, PETITIONER ROBERT WAREING, PETITIONER DEREK WYATT, PETITIONER BILL ETHERINGTON, PETITIONER ANN CRYER, PETITIONER RUDI VIS, PETITIONER SIMON THOMAS, PETITIONER FABIAN HAMILTON, PETITIONER PIARA S. KHABRA, PETITIONER STEPHEN LADYMAN, PETITIONER NICK PALMER, PETITIONER PHIL SAWFORD FOR PRO HAV VICE ADMISSION , AFFIDAVIT OF MARLENE KAMISH IN SUPPORT, PETITION FOR ADMISSION, AFFIDAVIT OF NICHOLAS R.D. BROWN IN SUPPORT, PROOF OF SERVICE. (lvj) (Entered: 09/06/2000)
09/05/2000	53	Notice of appeal by PETITIONER FOR CHICANA/CHICANO, PETITIONER JEREMY CORBYN, PETITIONER NEIL GERRARD, PETITIONER ALICE MAHON, PETITIONER VINCENT CABLE, PETITIONER JOHN. AUSTIN, PETITIONER MARTIN CATON, PETITIONER KELVIN HOPKINS, PETITIONER OONA KING, PETITIONER JOHN MCDONNELL, PETITIONER IAIN COLEMAN, PETITIONER ANDREW DISMORE, PETITIONER ROBERT WAREING, PETITIONER DEREK WYATT, PETITIONER BILL ETHERINGTON, PETITIONER ANN CRYER, PETITIONER RUDI VIS, PETITIONER SIMON THOMAS, PETITIONER FABIAN HAMILTON, PETITIONER PIARA S. KHABRA, PETITIONER STEPHEN LADYMAN, PETITIONER NICK PALMER, PETITIONER PHIL SAWFORD . Fee Status: 105.00 . Copies to: JUDGE WILLIAM H. YOHN JR. , Clerk USCA, Appeals Clerk, and NICK BROWN, JULES EPSTEIN, LEONARD I. WEINGLASS, DANIEL R. WILLIAMS, STEVEN W. HAWKINS, DONNA G. ZUCKER, HUGH J. BURNS JR., KARL BAKER, EARL W. TRENT JR., JOSEPH Z. TRAUB (lvj) (Entered: 09/06/2000)
09/05/2000	54	Copy of Clerk's notice to USCA re: [53-1] appeal . (lvj) (Entered: 09/06/2000)

09/07/2000		CERTIFIED AND TRANSMITTED RECORD ON APPEAL TO U.S. COURT OF APPEALS. Transmitted pleadings # 39, 40, 41, 42, 44, 45 only as per instructions from U.S.C.A. (jpd) (Entered: 09/07/2000)
09/13/2000		Notice of Docketing ROA from USCA Re: [53-1] appeal USCA NUMBER: 00-9007 . 9/12/00 (lvj) (Entered: 09/13/2000)
09/15/2000	55	ORDER THAT MOTION FOR PRO HAC VICE ADMISSION IS DENIED WITHOUT PREJUDICE. ( SIGNED BY JUDGE WILLIAM H. YOHN JR. ) 9/18/00 ENTERED AND COPIES MAILED. (lvj) (Entered: 09/18/2000)
12/08/2000	56	Certified copy of order from USCA that the petition for writ of mandamus is denied, etc. (lvj) (Entered: 12/11/2000)
12/08/2000	57	Certified copy of order from USCA dated: 12/08/00 TERMINATING [53-1] appeal. The appeal is dismissed as jurisdictionally defective, etc. (lvj) (Entered: 12/11/2000)
03/05/2001	58	MOTION BY PETITIONER MUMIA ABU-JAMAL FOR THE WITHDRAWAL OF COUNSEL FOR CONFLICT OF INTEREST , BRIEF IN SUPPORT, CERTIFICATE OF SERVICE. (lvj) (Entered: 03/06/2001)
03/22/2001	59	ORDER THAT PETITIONER'S APPLICATION TO AMEND HIS PETITION FOR HABEAS CORPUS RELIEF IS DENIED AS MOOT; RESPONDENTS' MOTION TO STRIKE IS DENIED AS MOOT. ( SIGNED BY JUDGE WILLIAM H. YOHN JR. ) 3/22/01 ENTERED AND COPIES MAILED. (lvj) (Entered: 03/22/2001)
03/26/2001	60	PETITIONER MUMIA ABU-JAMAL reply brief to the commonwealth's letter brief of 3/14/01, Certificate of Service. (lvj) (Entered: 03/26/2001)
04/02/2001	61	MOTION BY RESPONDENT ATTY GEN OF PA., RESPONDENT DA FOR PHILADELPHIA, RESPONDENT CONNER BLAINE, RESPONDENT MARTIN HORN FOR RECONSIDERATION OF ORDER ALLOWING DE FACTO AMENDMENT OF HABEAS CORPUS PETITION , CERTIFICATE OF SERVICE. (lvj) (Entered: 04/02/2001)
04/06/2001	62	ORDER THAT THE WITHDRAWAL OF PETITIONER'S COUNSEL IS APPROVED IMMEDIATELY UPON THE ENTRY OF APPEARANCE OF NEW COUNSEL. ADDITIONALLY, THE COURT WILL NOT CONDUCT ORAL ARGUMENT, AN EVIDENTIARY HEARING, OR ISSUE AN OPINION CONCERNING THE PENDING PETITION FOR HABEAS CORPUS RELIEF FOR A PERIOD OF AT LEAST THIRTY DAYS FROM THE DATE OF THIS ORDER SO THAT PETITIONER MAY HAVE AN OPPORTUNITY FOR NEW COUNSEL TO ENTER AN APPEARANCE. ( SIGNED BY JUDGE WILLIAM H. YOHN JR. ) 4/9/01 ENTERED AND COPIES MAILED. (lvj) (Entered: 04/09/2001)
04/26/2001	63	MOTION BY PETITIONER MUMIA ABU-JAMAL FOR ORDER TO PRIOR COUNSEL TO PROVIDE ACCOUNTING PER RULE 1.15(a)(b). , BRIEF IN SUPPORT, CERTIFICATE OF SERVICE. (lvj) (Entered: 04/26/2001)
05/04/2001	64	Notice of Appearance by J. MICHAEL FARRELL as one of the attorneys of record for petitioner for PETITIONER MUMIA ABU-JAMAL , Certificate of Service. (lvj) (Entered: 05/07/2001)
05/04/2001	65	MOTION BY PETITIONER MUMIA ABU-JAMAL FOR ADMISSION OF ATTORNEYS PRO HAC VICE , CERTIFICATE OF SERVICE. (lvj) (Entered: 05/07/2001)
05/04/2001	66	MOTION BY NICHOLAS R.D. BROWN FOR PETITIONER MUMIA ABU-JAMAL TO APPEAR PRO HAC VICE , CERTIFICATE OF SERVICE. (lvj) (Entered: 05/07/2001)

		05/07/2001)
05/04/2001	67	Notice of Appearance of NICK BROWN, ESQ. as one of the attorneys of record for petitioner for PETITIONER MUMIA ABU-JAMAL , Certificate of Service. (lvj) (Entered: 05/07/2001)
05/04/2001	68	Notice of Appearance by ELIOT LEE GROSSMAN, ESQ as one of the attorneys of record for PETITIONER MUMIA ABU-JAMAL , Certificate of Service. (lvj) (Entered: 05/07/2001)
05/04/2001	69	APPLICATION of Eliot Lee Grossman for admission pro haec vice to the United States District Court for the Eastern District of Pennsylvania, certificate of service. (lvj) (Entered: 05/07/2001)
05/04/2001	70	Declaration by PETITIONER MUMIA ABU-JAMAL , Certificate of Service. (lvj) (Entered: 05/07/2001)
05/04/2001	71	Declaration of William Cook , Certificate of Service. (lvj) (Entered: 05/07/2001)
05/04/2001	72	Supplemental declaration of William Cook, certificate of service. (lvj) (Entered: 05/07/2001)
05/04/2001	73	Declaration of Arnold Beverly , Certificate of Service. (lvj) (Entered: 05/07/2001)
05/04/2001	74	Affidavit of Donald Hersing Re: certain facts, certificate of service. (lvj) (Entered: 05/07/2001)
05/04/2001	75	Declaration of Linn Washington , Certificate of Service. (lvj) (Entered: 05/07/2001)
05/04/2001	76	Notice of Appearance by MARLENE KAMISH as one of the attorneys of record for petitioner MUMIA ABU-JAMAL , Certificate of Service. (lvj) (Entered: 05/07/2001)
05/04/2001	77	APPLICATION by Marlene Kamish, ESQ for admission pro hac vice to the bar of this honorable court, certificate of service. (lvj) (Entered: 05/07/2001)
05/04/2001	78	EMERGENCY MOTION BY PETITIONER MUMIA ABU-JAMAL FOR ORDER AUTHORIZING DEPOSITION AND REQUEST FOR EXPEDITED CONSIDERATION OF MOTION , CERTIFICATE OF SERVICE. (lvj) (Entered: 05/07/2001)
05/04/2001	79	Notice of filing of affidavits and other documents by PETITIONER MUMIA ABU-JAMAL, certificate of service. (lvj) (Entered: 05/07/2001)
05/11/2001	80	Response (answer) by COMMONWEALTH (RESPONDENTS) to petitioner's EMERGENCY MOTION FOR ORDER AUTHORIZING DEPOSITION, Certificate of Service. (gm) (Entered: 05/14/2001)
05/11/2001	81	Response (answer) by COMMONWEALTH (RESPONDENTS) to MOTION FOR ADMISSION OF ATTORNEYS PRO HAC VICE, Certificate of Service. (gm) (Entered: 05/14/2001)
05/16/2001	82	ORDER THAT THE MOTION FOR ADMISSION OF ATTORNEYS PRO HAC VICE IS GRANTED AS TO ATTORNEYS MARLENE KAMISH, ESQ. AND ELIOT LEE GROSSMAN, ESQ. THE PETITIONER'S COUNSEL SHALL FILE A BRIEF IN SUPPORT OF HIS MOTION ON OR BEFORE 6/4/01 AND RESPONDENTS SHALL FILE A BRIEF IN SUPPORT OF THEIR OBJECTIONS THERETO ON OR BEFORE 6/18/01. ( SIGNED BY JUDGE WILLIAM H. YOHN JR. ) 5/16/01 ENTERED AND COPIES MAILED AND FAXED. (lvj) (Entered: 05/16/2001)
05/29/2001	83	PETITIONER MUMIA ABU-JAMAL application for leave to respond and proposed response to respondents' opposition to petitioner's motion to take deposition of Arnold

		Beverly, certificate of service. (lvj) (Entered: 05/30/2001)
05/29/2001	84	Declaration of Charles R. Honts, PH.D. May 18, 19999 and appendices by PETITIONER MUMIA ABU-JAMAL , Certificate of Service. (lvj) (Entered: 05/30/2001)
05/29/2001	85	Declaration of Charles R. Honts, PH.D. May 16, 2001 and exhibits by PETITIONER MUMIA ABU-JAMAL , Certificate of Service. (lvj) (Entered: 05/30/2001)
05/29/2001	86	Notice of filing by PETITIONER MUMIA ABU-JAMAL with copy of letter to Honorable William H. Yohn, Jr. dated 5/29/01 attached. (lvj) (Entered: 05/30/2001)
05/30/2001	87	ORDER THAT THE NAME AND ADDRESS OF NICK BROWN, ESQ. LISTED AS COUNSEL FOR THE PETITIONER ON PAGE 12 ARE STRICKEN IN THAT MR. BROWN HAS NOT AS YET BEEN GRANTED PERMISSION TO ENTER AN APPEARANCE. THE APPLICAITON FOR LEAVE TO RESPOND IS GRANTED AND THE PROPOSED RESPONSE IS FILED. THE RESPONDENTS MAY FILE A REPLY TO THE RESPONSE ON OR BEFORE 6/15/01 , ETC. ( SIGNED BY JUDGE WILLIAM H. YOHN JR. ) 5/30/01 ENTERED AND COPIES MAILED. (lvj) (Entered: 05/30/2001)
05/30/2001	88	ORDER THAT PEITTIONER'S MOTION FOR ORDER TO PRIOR COUNSEL TO PROVIDE ACCONTING PER RULE 1.15(a)(b) IS DENIED, ETC.. ( SIGNED BY JUDGE WILLIAM H. YOHN JR. ) 5/30/01 ENTERED AND COPIES MAILED. (lvj) (Entered: 05/30/2001)
05/31/2001	89	ORDER THAT THE MOTION FOR RECONSIDERATION OF ORDER ALLOWING DE FACTO AMENDMENT OF HABEAS CORPUS PETITION IS GRANTED AND THE COURT'S ORDER OF 3/22/01 IS VACATED . RESPONDENTS' MOTION TO STRIKE PETITIONER'S REPLY MEMORANDUM IS DENIED. RESPONDENTS MAY FILE A RESPONSE TO PETITIONER'S REPLY MEMORANDUM PARTICULARLY WITH REFERENCE TO THE ISSUES RAISED IN THE WHITNEY CASE, ON OR BEFORE 6/29/01 . ( SIGNED BY JUDGE WILLIAM H. YOHN JR. ) 6/1/01 ENTERED AND COPIES MAILED. (lvj) (Entered: 06/01/2001)
06/04/2001	90	PETITIONER MUMIA ABU-JAMAL brief in support of MOTION FOR NICHOLAS R.D. BROWN, ESQ. TO BE ADMITTED PRO HAC VICE AS ONE OF THE COUNSEL FOR PETITIONER , Certificate of Service. (lvj) (Entered: 06/04/2001)
06/12/2001	91	APPLICATION of PETITIONER MUMIA ABU-JAMAL FOR LEAE TO FILE A SUPPLEMENTAL RESPONSE AND PROPOSED SUPPLEMENTAL RESPONSE TO RESPONDANTS OPPOSITION TO PETITIONER'S MOTION TO TAKE DEPOSITION OF ARNOLD BEVERLY., Certificate of Service. (jpd) (Entered: 06/12/2001)
06/15/2001	92	Brief of by RESPONDENT ATTY GEN OF PA., RESPONDENT DA FOR PHILADELPHIA, RESPONDENT CONNER BLAINE, RESPONDENT MARTIN HORN regarding pro hac vice application , Certificate of Service. (lvj) (Entered: 06/18/2001)
06/15/2001	93	Response by RESPONDENT ATTY GEN OF PA., RESPONDENT DA FOR PHILADELPHIA, RESPONDENT CONNER BLAINE, RESPONDENT MARTIN HORN to petitioner's application for leave to respond to commonwealth's answer to motion for discovery, Certificate of Service. (lvj) (Entered: 06/18/2001)
06/19/2001	94	Brief by RESPONDENT DA FOR PHILADELPHIA, RESPONDENT ATTY GEN OF PA., RESPONDENT CONNER BLAINE, RESPONDENT MARTIN HORN Regarding Whitney v. Horn and Petitioner's Unauthorized Reply to its Answer o Petitioner's Motion to Amend, Certificate of Service. (np) (Entered: 06/20/2001)

07/03/2001	95	MOTION BY PETITIONER MUMIA ABU-JAMAL TO HOLD FEDERAL HABEAS CORPUS PROCEEDINGS IN ABEYANCE AND FOR REMAND OF RECORD TO THE COURT OF COMMON PLEAS OF THE CMW OF PA, FOR THE COUNTY OF PHILADELPHIA , EXHIBITS, CERTIFICATE OF SERVICE. (gm) (Entered: 07/05/2001)
07/05/2001	96	ORDER THAT UPON CONSIDERATION OF THE PETITIONER'S BRIEF IN SUPPORT OF MOTION FOR NICHOLAS R.D.BROWN,ESQ.,TO BE ADMITTED PRO HAC VICE AND THE CMW'S RESPONSE, IT IS HEREBY ORDERED THAT THE "MOTION TO APPEAR PRO HAC VICE" IS GRANTED AND NICHOLAS R.D.BROWN MAY APPEAR AS COUNSEL FOR PETITIONER, ETC. ( SIGNED BY JUDGE WILLIAM H. YOHN JR. ) 7/5/01 ENTERED AND COPIES MAILED AND FAXED. (gm) (Entered: 07/05/2001)
07/10/2001	97	ORDER THAT THE COMMONWEALTH SHALL FILE A RESPONSE THERETO ON OR BEFORE ON OR BEFORE 8/9/01 . ( SIGNED BY JUDGE WILLIAM H. YOHN JR. ) 7/10/01 ENTERED AND COPIES MAILED . (lvj) (Entered: 07/10/2001)
07/16/2001	98	Notice of filing by PETITIONER MUMIA ABU-JAMAL a petition for post-conviction relief and/or writ of habeas corpus was filed in the court of common pleas of the Commonwealth of Pa for the County Philadelphia, certificate of service. (lvj) (Entered: 07/16/2001)
07/19/2001	99	MEMORANDUM AND ORDER THAT PETITIONER'S EMERGENCY MOTION FOR ORDER AUTHORIZING DEPOSITION IS DENIED. ( SIGNED BY JUDGE WILLIAM H. YOHN JR. ) 7/20/01 ENTERED AND COPIES MAILED. (lvj) (Entered: 07/20/2001)
07/23/2001	100	Response by RESPONDENT ATTY GEN OF PA., RESPONDENT DA FOR PHILADELPHIA, RESPONDENT CONNER BLAINE, RESPONDENT MARTIN HORN to PETITIONER'S MOTION TO HOLD FEDERAL HABEAS CORPUS PROCEEDINGS IN ABEYANCE AND FOR REMAND OF RECORD TO THE COURT OF COMMON PLEAS OF THE CMW OF PA, FOR THE COUNTY OF PHILADELPHIA , Certificate of Service. (jpd) (Entered: 07/24/2001)
07/25/2001	101	MEMORANDUM AND ORDER THAT PETITIONER'S APPLICATION FOR LEAVE TO AMEND THE PETITION FOR HABEAS CORPUS RELIEF IS DENIED. ( SIGNED BY JUDGE WILLIAM H. YOHN JR. ) 7/25/01 ENTERED AND COPIES MAILED (lvj) (Entered: 07/25/2001)
07/30/2001	102	MOTION BY PETITIONER MUMIA ABU-JAMAL FOR RECONSIDERATION OF THE MEMORANDUM AND ORDER DATED 19TH JULY 2001 DENYING THE PETITIONER'S EMERGENCY MOTION FOR AN ORDER AUTHORIZING THE DEPOSITION OF ARNOLD BEVERLY , CERTIFICATE OF SERVICE. (lvj) (Entered: 07/30/2001)
07/30/2001	103	Affidavit of Rachel H. Wolkenstein Re: in support of Petitioner's MOTION TO RECONSIDER DENIAL OF LEAVE TO DEPOSE ARNOLD BEVERLY AND IN SUPPORT OF PETITIONER'S MOTION FOR LEAVE TO FILE REDRAFTED AND AMENDED PETITION FOR WRIT OF HABEAS CORPUS, CERTIFICATE OF SERVICE. (lvj) (Entered: 07/30/2001)
07/31/2001	104	ORDER, THAT RESPONDENTS SHALL FILE A RESPONSE THERETO ON OR BEFORE 8/16/01 ( SIGNED BY JUDGE WILLIAM H. YOHN JR. ) 8/1/01 ENTERED AND COPIES MAILED AND FAXED. (jpd) (Entered: 08/01/2001)
08/06/2001	105	MOTION BY PETITIONER MUMIA ABU-JAMAL FOR LEAVE TO RE-DRAFT AND TO AMEND THE PETITION AND FOR RECONSIDERATION OF THE

		MEMORANDUM AND ORDER DATED 25TH JULY 2001 DENYING THE PETITIONER'S MOTION FOR LEAVE TO AMEND THE PETITION TO INCLUDE A THIRTIETH CLAIM , CERTIFICATE OF SERVICE. (PROPOSED FIRST REDRAFTED AND AMENDED PETITION VOLUME I OF II AND VOLUME II OF II ATTACHED) (lvj) Modified on 08/07/2001 (Entered: 08/07/2001)
08/06/2001	106	Exhibits by PETITIONER MUMIA ABU-JAMAL to Motion for leave to re-draft, etc, certificate of service. (lvj) (Entered: 08/07/2001)
08/16/2001	107	Commonwealth's answer to Petitioner's application for reconsideration of the denial o his motion for discovery regarding Arnold Beverly, Certificate of Service. (lvj) (Entered: 08/17/2001)
08/23/2001	108	ORDER THAT PETITIONER'S PROPOSED FIRST REDRAFTED AND AMENDED PE;TITION FOR HABEAS CORPUS RELIEF IS STRICKEN, ETC. PETITIONER'S EXHIBITS CONSISTING OF THE BRIEFS OF AMICUS CURIAE OR PORTIONS THEREOF ARE STRICKEN, ETC. IF RESPONDENTS DESIRE TO FILE A MOTION TO STRIKE PETITIONER'S MOTION FOR LEAVE TO REDRAFT AND TO AMEND AND FOR RECONSIDERATION SHALL BE FILED ON OR BEFORE 9/15/01 AND PETITIONER'S RESPONSE ON OR BEFORE 9/30/01. IF RESPONDENTS DO NOT FILE A MOTION TO STRIKE RESPONDENTS SHALL FILE A RESPONSE TO THE MOTION FOR LEAVE TO REDRAFT AND TO AMEND AND FOR RECONSIDERATION ON OR BEFORE 9/15/01. ( SIGNED BY JUDGE WILLIAM H. YOHN JR. ) 8/23/01 ENTERED AND COPIES MAILED. (lvj) (Entered: 08/23/2001)
08/24/2001	109	PETITIONER MUMIA ABU-JAMAL request for leave to file response and proposed response to Respondents' answer to Motion to reconsider denial of Petitioner's Motion to depose Arnold Beverly, certificate of service. (lvj) (Entered: 08/27/2001)
08/28/2001	110	Declaration of TERRI MAURER-CARTER , Certificate of Service. (jpd) (Entered: 08/28/2001)
09/07/2001	111	Notice of filing by PETITIONER MUMIA ABU-JAMAL video of Arnold Beverly attached, certificate of service. (lvj) (Entered: 09/10/2001)
09/12/2001	112	Declaration by PETITIONER MUMIA ABU-JAMAL of Robert H. Kirschner, M.D. in support of peittioner's request for discovery and evidentiary hearing , Certificate of Service. (lvj) (Entered: 09/13/2001)
09/13/2001	113	Affidavit of PROFESSOR EUGENE P. ERICKSEN in support of PETITION FOR WRIT OF HABEAS CORPUS, Certificate of Service. (afm) (Entered: 09/13/2001)
09/14/2001	114	Affidavit of RONALD L. SINGER Re: in support of Petitioner's request to File REDRAFTED AND AMENDED PETITION FOR HABEAS CORPUS AND FOR DISCOVERY AND EVIDENTIARY HEARING, Certificate of Service. (afm) Modified on 09/17/2001 (Entered: 09/14/2001)
09/14/2001	115	Supplement to Affidavit of PROFESSOR EUGENE P. ERICKSEN Re: in support of Petition for WRIT OF HABEAS CORPUS/CURRICULUM VITAE, Certificate of Service. (afm) (Entered: 09/17/2001)
09/17/2001	116	PETITIONER MUMIA ABU-JAMAL supplement to twenty-ninth claim for relief in petition for writ of habeas corpus, certificate of service. (lvj) (Entered: 09/18/2001)
09/17/2001	117	Commonwealth's answer to Petitioner's combined MOTION FOR LEAVE TO RE-DRAFT THE CLAIMS ALREADY RAISED IN THE HABEAS PETITION; TO AMEND THE HABEAS PETITION WITH NEW CLAIMS; AND FOR RECONSIDERATION OF THE DENIAL OF HIS MOTION FOR LEAVE TO AMEND

		THE PETITION WITH THE JOHN AFRICA CLAIM , Certificate of Service. (lvj) (Entered: 09/18/2001)
09/17/2001	118	Commonwealth's answer to petitioner's request for leave to file response to its answer to his application for reconsideration of the denial of this motion for discovery regarding Arnold Beverly, Certificate of Service. (lvj) (Entered: 09/18/2001)
09/19/2001	119	Declaration of Arnold Howard , Certificate of Service. (lvj) (Entered: 09/19/2001)
09/19/2001	120	ORDER THAT THE AFFIDAVIT OF PROFESSOR EUGEN P. ERICKSON AND THE SUPPLEMENT TO AFFIDAVIT OF PROFESSOR EUGENE P. ERICKSON IN SUPPORT OF PETITION FOR WRIT OF HABEAS CORPUS FILED 9/13/01 AND 9/14/01 ARE STRICKEN, ETC. THE DECLARATION OF ROBERT H. KIRSCHNER, MD IN SUPPORT OF PETITIONER'S REQUEST FOR DISCOVERY AND EVIDENTIARY HEARING IS STRICKEN. IN THE EVENT THAT PETITIONER'S REQUEST FOR DISCOVERY OR AN EVIDENTIARY IS GRANTED THE DECLARATION OR TESTIMONY OF DR. KIRSCHNER MAY BE SUBMITTED AT THAT TIME SUBJECT TO ALL OTHER APPROPRIATE OBJECTIONS. THE AFFIDAVIT OF RONALD L. SINGER IN SUPPORT OF PETITIONER'S REQUEST TO FILE REDRAFTED AND AMENDED PETITION FOR HABEAS CORPUS AND FOR DISCOVERY AND EVIDENTIARY HEARING IS STRICKEN, ETC. COUNSEL FOR THE PETITIONER ARE ADMONISHED THAT THESE FILINGS MUST CEASE AND THAT COUNSEL SHALL FILE ONLY THOSE DOCUMENTS FOR WHICH THEY HAVE REQUESTED AND RECEIVED PRIOR PERMISSION BY THE COURT OR THAT THE COURT REQUESTS. ( SIGNED BY JUDGE WILLIAM H. YOHN JR. ) 9/20/01 ENTERED AND COPIES MAILED (lvj) (Entered: 09/20/2001)
10/02/2001	121	MOTION BY PETITIONER MUMIA ABU-JAMAL FOR LEAVE TO FILE DECLARATION OF GEORGE MICHAEL NEWMAN, PRIVATE INVESTIGATOR, IN SUPPORT OF MOTION TO RECONSIDER DENIAL OF DEPOSITION OF ARNOLD BEVERLY, IN SUPPORT OF MOTION FOR LEAVE TO FILE REDRAFTED AND AMENDED HABEAS PETITION AND IN SUPPORT OF EVIDENTIARY HEARING AND DISCOVERY , CERTIFICATE OF SERVICE. (DECLARATION ATTACHED) (lvj) (Entered: 10/02/2001)
10/10/2001	122	ORDER THAT PETITIONER'S MOTION FOR LEAVE TO FILE DECLARATION OF GEORGE MICHAEL NEWMAN IS DENIED PENDING DISPOSITION OF THE MOTION FOR LEAVE TO FILE REDRAFTED AND AMENDED HABEAS PETITION. ( SIGNED BY JUDGE WILLIAM H. YOHN JR. ) 10/10/01 ENTERED AND COPIES MAILED. (lvj) (Entered: 10/10/2001)
10/11/2001	123	ORDER THAT THE RESPONDENTS SHALL FILE A RESPONSE THERETO ON OR BEFORE 10/24/01 ( SIGNED BY JUDGE WILLIAM H. YOHN JR. ) 10/12/01 ENTERED AND COPIES MAILED (lvj) (Entered: 10/12/2001)
10/12/2001	124	COMMONWEALTH'S ANSWER TO PETITIONER'S SUPPLEMENT, Certificate of Service. (lvj) (Entered: 10/15/2001)
10/16/2001	125	MEMORANDUM AND ORDER THAT UPON CONSIDERATION OF PETITIONER'S MOTION FOR RECONSIDERATION OF THE COURT'S JULY 19, 2001 MEMORANDUM AND ORDER (#102) AND THE CMW'S RESPONSE THERTO (#107) IT IS HEREBY ORDERED THAT THE MOTION IS DENIED. PETITIONER'S REQUEST FOR LEAVE TO FILE A RESPONSE TO RESPONDENTS' ANSWER (#109) IS ALSO DENIED. ( SIGNED BY JUDGE WILLIAM H. YOHN JR. ) 10/16/01 ENTERED AND COPIES MAILED. (gm) (Entered: 10/16/2001)
10/17/2001	126	ORDER THAT THE MOTION TO HOLD THE FEDERAL HABEAS CORPUS

		PROCEEDING IN ABEYANCE IS DENIED. THE MOTION TO REMAND THE RECORD TO THE COURT OF COMMON PLEAS OF THE COMMONWEALTH OF PENNSYLVANIA, FOR THE COUNTY OF PHILADELPHIA IS DENIED ETC. (SIGNED BY JUDGE WILLIAM H. YOHN JR.) 10/17/01 ENTERED AND COPIES MAILED (jpd) (Entered: 10/17/2001)
10/22/2001	127	MOTION BY PETITIONER MUMIA ABU-JAMAL TO RECONSIDER ORDER DENYING LEAVE TO FILE DECLARATION OF GEORGE MICHAEL NEWMAN, PRIVATE INVESTIGATOR , CERTIFICATE OF SERVICE. (lvj) (Entered: 10/22/2001)
10/22/2001	128	MOTION BY PETITIONER MUMIA ABU-JAMAL FOR LEAVE TO FILE DECLARATIONS OF DR. ERICKSEN, DR. KIRSCHNER, AND AFFIDAVIT OF RON SINGER M.A. AND/OR FOR LEAVE TO FILE MOTION AND PROPOSED MOTION TO EXPAND RECORD PURSUANT TO RULE 7 OF THE RULES GOVERNING SECTION 2254 CASES , CERTIFICATE OF SERVICE. (lvj) (Entered: 10/22/2001)
10/22/2001	129	MOTION BY PETITIONER MUMIA ABU-JAMAL FOR LEAVE TO FILE DECLARATION OF ELIOT LEE GROSSMAN, ESQ. RE: TIMELINESS OF FILING OF DECLARATION OF TERRI MAURER-CARTER AND/OR FOR LEAVE TO FILE MOTION TO EXPAND RECORD PURSUANT TO RULE 7 OF THE RULES GOVERNING SECTION 2254 CASES, AND PROPOSED DECLARATION , CERTIFICATE OF SERVICE. (lvj) (Entered: 10/22/2001)
10/24/2001	130	ORDER THAT, THE RESPONDENT SHALL FILE A RESPONSE THERETO ON OR BEFORE 11/10/01 (SIGNED BY JUDGE WILLIAM H. YOHN JR.) 10/24/01 ENTERED AND COPIES MAILED FAXED. (jpd) (Entered: 10/24/2001)
11/02/2001	131	MOTION BY PETITIONER MUMIA ABU-JAMAL FOR LEAVE TO FILE MARCH 1927 ARTICLE BY JUSTICE FELIX FRANKFURTER ON SACCO-VANZETTI CASE , CERTIFICATE OF SERVICE. (lvj) (Entered: 11/02/2001)
11/06/2001	132	ORDER THAT PETITIONER'S MOTION FOR LEAVE TO FILE MARCH 1927 ARTICLE BY JUSTICE FELIX FRANKFURTER ON SACCO-VANZETTI CASE IS DENIED. ( SIGNED BY JUDGE WILLIAM H. YOHN JR. ) 11/06/01 ENTERED AND COPIES MAILED (lvj) (Entered: 11/06/2001)
11/07/2001	133	Response by RESPONDENT ATTY GEN OF PA., RESPONDENT DA FOR PHILADELPHIA, RESPONDENT CONNER BLAINE, RESPONDENT MARTIN HORN to PETITIONER'S MOTION TO RECONSIDER ORDER DENYING LEAVE TO FILE DECLARATION OF GEORGE MICHAEL NEWMAN, PRIVATE INVESTIGATOR, [128-2] MOTION FOR LEAVE TO FILE MOTION AND PROPOSED MOTION TO EXPAND RECORD PURSUANT TO RULE 7 OF THE RULES GOVERNING SECTION 2254 CASES, [128-1] MOTION FOR LEAVE TO FILE DECLARATIONS OF DR. ERICKSEN, DR. KIRSCHNER, AND AFFIDAVIT OF RON SINGER M.A., [129-2] MOTION FOR LEAVE TO FILE MOTION TO EXPAND RECORD PURSUANT TO RULE 7 OF THE RULES GOVERNING SECTION 2254 CASES, AND PROPOSED DECLARATION, [129-1] MOTION FOR LEAVE TO FILE DECLARATION OF ELIOT LEE GROSSMAN, ESQ. RE: TIMELINESS OF FILING OF DECLARATION OF TERRI MAURER-CARTER , Certificate of Service. (lvj) (Entered: 11/08/2001)
11/09/2001	134	MOTION BY PETITIONER MUMIA ABU-JAMAL FOR LEAVE TO FILE DECLARATION OF ARNOLD HOWARD DATED 8/31/01 IN SUPPORT OF MOTION FOR LEAVE TO FILE REDRAFTED AND AMENDED HABEAS PEITION AND IN SUPPORT OF REQUEST FOR EVIDENTIARY HEARING AND DISCOVERY , CERTIFICATE OF SERVICE. (lvj) (Entered: 11/13/2001)

11/14/2001	135	MOTION BY PETITIONER MUMIA ABU-JAMAL FOR LEAVE TO FILE FURTHER EVIDENCE IN SUPPORT OF MOTION TO FILE REDRAFTED AND AMENDED HABEAS PETITION IN SUPPORT OF LEGAL CONTENTIONS CONCERNING CONFLICTS OF INTEREST BY PRIOR COUNSEL; AND IN SUPPORT OF ACTUAL INNOCENCE CLAIMS , CERTIFICATE OF SERVICE. (lvj) (Entered: 11/14/2001)
12/18/2001	136	MEMORANDUM AND ORDER THAT PETITIONER'S MOTION FOR LEAVE TO RE-DRAFT ,TO AMEND THE PETITION AND FOR RECONSIDERATION IS DENIED. IT IS FURTHER ORDERED THAT PETITIONER'S SUPPLEMENT TO HIS TWENTY-NINTH CLAIM FOR RELIEF IS STRICKEN AND THE FOLLOWING MOTIONS ARE DENIED AS MOOT; PETITIONER'S MOTION FOR LEAVE TO FILE DECLARATION OF ARNOLD HOWARD. PETITIONER'S MOTION FOR LEAVE TO FILE FURTHER EVIDENCE IN SUPPORT OF MOTION TO FILE REDRAFTED AND AMENDED HABEAS PETITION. PETITIONER'S MOTION TO RECONSIDER ORDER DENYING LEAVE TO FILE DECLARATION OF GEORGE MICHAEL NEWMAN; AND PETITIONER'S MOTION FOR LEAVE TO FILE DECLARATION OF ELIOT LEE GROSSMAN, ESQ. ( SIGNED BY JUDGE WILLIAM H. YOHN JR. ) 12/18/01 ENTERED AND COPIES MAILED FAXED. (lvj) (Entered: 12/18/2001)
12/18/2001	137	ORDER THAT PETITIONER'S MOTION FOR LEAVE TO FILE DECLARATIONS OF DR. ERICKSEN, DR. KIRSCHNER, AND AFFIDAVIT OF RON SINGER M.A. AND/OR MOTION FOR LEAVE TO FILE MOTION AND PROPOSED MOTION TO EXPAND RECORD PURSUANT TO RULE 7 OF THE RULES GOVERNING SECTION 2254 CASES IS DENIED. ( SIGNED BY JUDGE WILLIAM H. YOHN JR. ) 12/18/01 ENTERED AND COPIES MAILED AND FAXED. (lvj) (Entered: 12/18/2001)
12/18/2001	138	MEMORANDUM AND ORDER THAT PETITIONER'S PETITION FOR HABEAS CORPUS RELIEF IS DENIED EXCEPT AS TO CLAIM 25 AS TO WHICH THE PETITION IS GRANTED; THE EXECUTION OF THE WRIT OF HABEAS CORPUS IS STAYED FOR 180 DAYS FROM THE DATE OF THIS ORDER DURING WHICH PERIOD THE COMMONWEALTH OF PA MAY CONDUCT A NEW SENTENCING HEARING IN A MANNER CONSISTENT WITH THIS OPINION; AFTER 180 DAYS SHOULD THE COMMONWEALTH OF PA NOT HAVE CONDUCTED A NEW SENTENCING HEARING, THE WRIT SHALL ISSUE AND THE COMMONWEALTH SHALL SENTENCE PETITIONER TO LIFE IMPRISONMENT; AND A CERTIFICATE OF APPEALABILITY IS GRNATED TO PETITIONER AS TO CLAIM 16. IF EITHER PETITIONER OR RESPONDENTS FILE AN APPEAL TO THE UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT THE ENTRY OF THIS ORDER WILL BE STAYED PURSUANT TO E.D. PA LOCAL R. 9.4(12) PENDING THE DISPOSITION OF THAT APPEAL. ( SIGNED BY JUDGE WILLIAM H. YOHN JR. ) 12/18/01 ENTERED AND COPIES MAILED AND FAXED. (lvj) (Entered: 12/18/2001)
12/18/2001		Case closed (kv) (Entered: 01/03/2002)
12/20/2001	139	Notice of appeal by RESPONDENT ATTY GEN OF PA., RESPONDENT DA FOR PHILADELPHIA, RESPONDENT CONNER BLAINE, RESPONDENT MARTIN HORN . Fee Status: 105.00 . Copies to: JUDGE WILLIAM H. YOHN JR. , Clerk USCA, Appeals Clerk, and MICHAEL COARD, NICK BROWN, MARLENE KAMISH, ELIOT LEE GROSSMAN, J. MICHAEL FARRELL, JULES EPSTEIN, LEONARD I. WEINGLASS, DANIEL R. WILLIAMS, STEVEN W. HAWKINS, DONNA G. ZUCKER, HUGH J. BURNS JR., KARL BAKER, EARL W. TRENT JR., JOSEPH Z. TRAUB (lvj) (Entered: 12/21/2001)

12/20/2001	140	Copy of Clerk's notice to USCA re: [139-1] appeal . (lvj) (Entered: 12/21/2001)
01/02/2002		Notice of Docketing ROA from USCA Re: [139-1] appeal USCA NUMBER: 01-9014 . 1/3/02 (afm) (Entered: 01/03/2002)
01/10/2002	141	Copy of TPO form ref: [139-1] appeal . (lvj) (Entered: 01/11/2002)
01/15/2002		RECORD COMPLETE FOR PURPOSES OF APPEAL. (ke) (Entered: 01/15/2002)
01/16/2002	142	Notice of cross-appeal by PETITIONER MUMIA ABU-JAMAL . Fee Status: 105.00 . Copies to: JUDGE WILLIAM H. YOHN JR. , Clerk USCA, Appeals Clerk, and MICHAEL COARD, NICK BROWN, MARLENE KAMISH, ELIOT LEE GROSSMAN, J. MICHAEL FARRELL, JULES EPSTEIN, LEONARD I. WEINGLASS, DANIEL R. WILLIAMS, STEVEN W. HAWKINS, DONNA G. ZUCKER, HUGH J. BURNS JR., KARL BAKER, EARL W. TRENT JR., JOSEPH Z. TRAUB (lvj) Modified on 01/17/2002 (Entered: 01/17/2002)
01/16/2002	143	Copy of Clerk's notice to USCA re: [142-1] appeal . (lvj) (Entered: 01/17/2002)
01/18/2002		CERTIFIED AND TRANSMITTED RECORD ON APPEAL TO U.S. COURT OF APPEALS.(Pleadings # 15, 39-42, 44, 45, 47, 61, 141, not included. State court record included(5 BOXES)). (ke) (Entered: 01/18/2002)
01/18/2002		Notice of Docketing ROA from USCA Re: [142-1] appeal USCA NUMBER: 02-9001 . 1/18/02 (lvj) (Entered: 01/22/2002)
02/01/2002	144	Copy of TPO form ref: [142-1] appeal . (afm) (Entered: 02/01/2002)
08/18/2003		Transmitted record received from USCA pleadings #39,40,41,42,44,45,50 only under appeal number 00-9007. (lvj, ) (Entered: 08/26/2003)
10/14/2003	145	NOTICE of Withdrawal of Appearance by NICK BROWN, J. MICHAEL FARRELL, ELIOT LEE GROSSMAN, MARLENE KAMISH on behalf of MUMIA ABU-JAMAL, certificate of service. (lvj, ) (Entered: 10/15/2003)
12/06/2005	146	Certified Copy of Order from USCA that the court agrees with the district court that a certificate of appealability should issue with regard to claim 16, etc. Appellant's supplemental motion for certification of additional issues for appeal is denied, etc. The court will also hear the commonwealth's appeal of the district court's order granting the petition as to claim 25. (lvj, ) (Entered: 12/07/2005)
07/31/2008	<a href="#">147</a>	ORDER of USCA as to 142 Notice of Appeal re: Judgment that the judgment of the District Court entered 12/18/01, be, and the same is hereby affirmed. (gs) (Entered: 07/31/2008)
10/19/2011	<a href="#">148</a>	Certified Copy of Order from USCA THAT ON 10/11/11 THE PETITION FOR WRIT OF CERTIORARI DOCKETED AT SUPREME COURT NO. 11-49, WAS DENIED BY THE UNITED STATES SUPREME COURT. IN ACCORDANCE WITH THE COURT'S OPINION FILED 4/26/11, THE ABOVE CAPTIONED MATTER IS REMANDED TO THE DISTRICT COURT WITH INSTRUCTIONS TO ENTER AN ORDER SETTING THE 180 DAY PERIOD IN WHICH THE COMMONWEALTH OF PENNSYLVANIA MAY CONDUCT A NEW SENTENCING HEARING OR SENTENCE THE APPELLANT TO LIFE INPRISONMENT. THE MANDATE SHALL ISSUE FORTHWITH. (jpd, ) (Entered: 10/19/2011)
10/19/2011	<a href="#">149</a>	Certified Copy of Order from USCA THAT THE JUDGMENT OF THE DISTRICT COURT ENTERED 12/18/01 BE AND THE SAME IS HEREBY AFFIRMED. COSTS TAXED AGAINST THE APPELLANT. ALL OF THE ABOVE IN ACCORDANCE WITH THE OPINION OF THIS COURT. (jpd) (Entered: 10/19/2011)

10/21/2011		PURSUANT TO THE LETTER REQUEST FROM JOHN W. PERSON, DEPUTY PROTHONOTARY OF THE SUPREME COURT REQUESTING THE STATE COURT RECORD IN THE ABOVE CAPTIONED MATTER BE FORWARDED TO THE SUPREME COURT OF PENNSYLVANIA AND THE ORDER DATED 8/29/02 OF THE UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT THE STATE COURT RECORD SHALL BE FORWARDED TO THE PROTHONOTARY'S OFFICE OF THE SUPREME COURT OF PENNSYLVANIA. IT IS REQUESTED THAT UPON COMPLETION OF THE PROCEEDINGS THAT THE STATE COURT RECORD BE RETURNED TO THE CLERK'S OFFICE OF THE UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT. (jpd) (Entered: 10/21/2011)
11/02/2011		ORIGINAL DISTRICT COURT RECORD IN THE CUSTODY OF THE OFFICE OF THE CLERK OF COURT. (jpd) (STATE COURT RECORD - 5 BOXES RETURNED TO SUPREME COURT OF PENNSYLVANIA BY THE THIRD CIRCUIT COURT OF APPEALS) Modified on 7/12/2012 (jef, ). (Entered: 11/02/2011)
12/06/2011	<a href="#">150</a>	ORDER THAT THE COMMONWEALTH OF PENNSYLVANIA MAY CONDUCT A NEW SENTENCING HEARING WITHIN ONE HUNDRED EIGHTY (180) DAYS OF THE DATE OF THIS ORDER, DURING WHICH PERIOD THE EXECUTION OF THE WRIT OF HABEAS CORPUS WILL BE STAYED, OR SHALL SENTENCE THE PETITIONER TO LIFE INPRISONMENT. SIGNED BY HONORABLE WILLIAM H. YOHN, JR ON 12/6/11. 12/6/11 ENTERED AND COPIES MAILED AND E-MAILED. (jpd) (Entered: 12/06/2011)

<b>PACER Service Center</b>			
<b>Transaction Receipt</b>			
11/21/2019 12:32:21			
<b>PACER Login:</b>	bl009417:2514765:0	<b>Client Code:</b>	
<b>Description:</b>	Docket Report	<b>Search Criteria:</b>	2:99-cv-05089-WY
<b>Billable Pages:</b>	19	<b>Cost:</b>	1.90

**EXHIBIT AA**

0112-0251 1/2

IN THE MUNICIPAL COURTS OF PHILADELPHIA  
COURTROOM 404  
CRIMINAL JUSTICE CENTER

COMMONWEALTH

VS.

CALYN ARNOLD

: CHARGES: BURGLARY, CONSPIRACY  
: CRIMINAL TRESPASS, CRIMINAL  
: MISCHIEF, AND POSSESSING  
: INSTRUMENTS OF CRIME  
: M.C. #01-08-1027

COMMONWEALTH

VS.

DANIELLE REDDEN

: CHARGES: BURGLARY, CRIMINAL  
: TRESPASS, CRIMINAL MISCHIEF,  
: AND POSSESSING INSTRUMENTS OF  
: CRIME  
: M.C. #01-08-1068

PHILADELPHIA, PENNSYLVANIA  
SEPTEMBER 6, 2001

REPORTED BY:

ROBERT P. CERULLI  
OFFICIAL COURT REPORTER

6266  
984

BEFORE: THE HONORABLE GWENDOLYN A. CONWAY

2/28  
904  
2-28-02  
904

Hearing - 1/28

Dot,  
The notes are  
partially cut-off.  
We're going to need  
a legible copy.

E  
ORNEY

ENDER  
NT (ARNOLD)

JUIRE:  
IT (REDDEN)

32

Kevin  
1/28

I N D E X

WITNESSES	DR.	CR.
OFF. HOWARD JONES		
By Ms. MILLER	4	
By Mr. NOLAN		9
By Mr. KRASNER		13
OFF. SUSAN JASIONOWSKI		
By Ms. MILLER	21	
By Mr. NOLAN		23
By Mr. KRASNER		26
PAUL BUCKO		
By Ms. MILLER	30	
By Mr. NOLAN		35
By Mr. KRASNER		36

MS. MILLER: YOUR HONOR, THE  
COMMONWEALTH IS READY.  
WE HAVE THREE WITNESSES.  
MR. NOLAN: MOTION FOR SEQUESTER  
THE COURT: ALL WITNESSES ARE  
ORDERED SEQUESTERED FOR BOTH SIDES.  
ARE THERE ANY DEFENSE WITNESSES  
IN THE ROOM?  
MR. NOLAN: No, YOUR HONOR.  
MR. KRASNER: No, OTHER THAN THE  
DEFENDANTS.  
OFFICER HOWARD JONES, NUMBER 4  
CIVIL AFFAIRS UNIT, PHILADELPHIA POLICE  
DEPARTMENT, HAVING BEEN DULY SWORN, WAS EXAMINED  
AND TESTIFIED AS FOLLOWS:

DIRECT EXAMINATION

BY MS. MILLER:  
Q. OFFICER JONES, ON AUGUST 13TH, OF THIS YEAR,  
APPROXIMATELY 7:25 P.M., WERE YOU ON DUTY AS A  
PHILADELPHIA POLICE OFFICER?  
A. YES, I WAS.  
Q. DID YOUR TOUR OF DUTY TAKE YOU TO THE AREA

**EXHIBIT BB**

« DISTRICT ATTORNEY LARRY KRASNER TO ANNOUNCE CREATION OF  
NEW POSITION TO FOCUS ON IMMIGRANT RIGHTS

District Attorney Larry Krasner to announce major consumer  
protection lawsuit »

## **LARRY KRASNER ANNOUNCES APPOINTMENT OF IMMIGRATION COUNSEL FOR PHILADELPHIA DISTRICT ATTORNEY'S OFFICE**

By Philadelphia District Attorney's Office

FOR IMMEDIATE RELEASE  
January 25th, 2018

CONTACT:

Ben Waxman, 215-686-8711, Benjamin.Waxman@Phila.gov

PHILADELPHIA (January 25, 2017) – Philadelphia District Attorney today announced the appointment of **Caleb U. Arnold** as Immigration Counsel to the Philadelphia District Attorney's Office (DAO). Arnold, who has over ten years of legal experience working on immigration issues, will advise the District Attorney and DAO staff on best practices to protect the rights of immigrants interacting with the criminal justice system. **(PLEASE NOTE: Caleb Arnold uses the pronouns They / Them)**

District Attorney Larry Krasner said, "I am thrilled today to announce the appointment of Caleb Arnold as Immigration Counsel to the Philadelphia District Attorney. **Caleb is the perfect person to help implement my agenda of equal justice and civil rights for all.** Together, we will ensure that all people are treated fairly by the justice system regardless of their immigration status. This is also part of our overall effort to protect the most vulnerable and ensure they are able participate as witnesses or complainants in the criminal justice system."

**EXHIBIT CC**



# DEFEND THE RNC 420

**WE LOVE YOU SISTERS! WE LOVE YOU BROTHERS!\***

Over 400 people were arrested while protesting at the 2000 Republican National Convention (RNC) in Philadelphia, PA. This website provides information on their legal situation and the issues they are protesting.

**R2K Legal:** [Civil Suits](#) | [Friends of Camilo](#) | [Lawyers](#) | [Lawyers](#) | [Legal FAQ](#) | [Legal Forms](#) | [Legal Updates](#) | [Press Releases](#) | [Legal Statistics](#) | [Mayor/DA Contact](#)

## Lawyers

### Public Defenders

Brad Bridge  
(215) 557-4960  
[Bbridge@philadefender.org](mailto:Bbridge@philadefender.org)

Meg Flores  
(215) 972-4524

Shawn Nolan  
(215) 557-4995  
[nolanshawn@hotmail.com](mailto:nolanshawn@hotmail.com)

### Private Lawyers

Paul Hetznecker  
(215) 893-9640

Larry Krasner  
(215) 731-9500

Ron Mcguire (New Jersey)  
(201) 795-0342

Messing, Epstein & Rudofsky (Phila)  
(215) 925-4400

King Downing  
(973) 483-0561

Notice: All information is subject to change, it's your responsibility to confirm with [R2K Legal](#).  
previous [r2klegal.org](#)

## About Us

Who are we? The R2K Network. Why are we protesting? Here's some [background](#).

[Add yours...](#)

## Donate

Please help support our Legal Fund for Camille and the Timoney 3 cases. To make a donation, contact: [info@r2klegal.org](mailto:info@r2klegal.org)

## Supporters

Letters of support:

[Activist Organizations](#)

[AFSCME Union](#)

[APWU Union](#)

[First Unitarian Church of Philadelphia](#)

[Members of Congress](#)

National Association for Socially Responsible Organizations

[Add yours...](#)

## R2K Mobilization Links:

Ad Hoc Committee to Defend Health Care  
[phillyhealth.org](http://phillyhealth.org)

## Home

[Breaking News](#)  
[Breaking News Archive](#)

## R2K Legal

[Civil Suits](#)  
[Friends of Camilo](#)  
[Lawyers](#)  
[Legal FAQ](#)  
[Legal Forms](#)  
[Legal Statistics](#)  
[Legal Timeline](#)  
[Legal Updates](#)  
[Mayor/DA Contact](#)  
[Press Releases](#)

R2K Legal Contact:  
[info@r2klegal.org](mailto:info@r2klegal.org)

Also see [Local Support](#) for contacts in your area.

## Calendar

You can [post](#) trial dates, events, meetings, etc, on the [R2K calendar](#).

## Local Support

Support groups are in the following areas:

Arcata, CA  
Boston, MA  
Connecticut  
New Jersey  
New York, NY  
Philadelphia, PA  
Providence, RI  
Virginia

**EXHIBIT DD**

R2K Legal Contact:  
[info@r2klegal.org](mailto:info@r2klegal.org)

Also see [Local Support](#) for contacts in your area.

## Calendar

You can [post](#) trial dates, events, meetings, etc. on the [R2K calendar](#).

## Local Support

Support groups are in the following areas:

Arcata, CA  
Boston, MA  
Connecticut  
New Jersey  
New York, NY  
Philadelphia, PA  
Providence, RI  
Virginia  
Washington, DC

[Add yours...](#)

## Outreach

[Flyers](#)  
Radical Cheerleaders

[Add yours...](#)

## Media Coverage

### Independent Media:

Independent Media Center of Philadelphia  
[phillyimc.org](http://phillyimc.org)  
2600 Magazine  
[2600.org](http://2600.org)

### Corporate Media:

Associated Press  
[ap.org](http://ap.org)  
Philadelphia Daily News  
[dailynews.philly.com](http://dailynews.philly.com)  
Philadelphia Inquirer

## Who is R2K Legal?

The R2K Legal Collective is comprised of:

- A) Activists
- B) working groups composed of activists (such as Outreach, Fundraising, and Media)
- C) the Legal Strategy Group (a closed group of attorneys, defendants, and supporters that has access to some confidential information but is not authorized to make decisions for the entire collective without approval)
- D) the Legal Team (criminal and civil lawyers who have volunteered or are paid to work on these cases, including PA public defenders, PA private attorneys, NY private attorneys, and national criminal law experts)

The A group (activists) has the authority to consense on proposals that come from groups B and C. The collective has open meetings every Tuesday night at 7:30 PM at 1501 Cherry Street, Philadelphia, PA. Tuesday meetings include reports from the defendants' meeting, working groups, meetings in other cities and regions, and the legal strategy group. Defendants (from all cities) have the last word on decisions affecting them.

## Who are the lawyers involved?

At this time, the [Legal Strategy Group](#) contains:

- 2 PA private attorneys, Larry Krasner and Paul Hetznecker
- 2 NY private attorneys, Anastasia [last name?] and Ron McGuire (who also works for SLAM)
- 1 NJ private attorney, King Downing

These lawyers are committed to the progressive political goals of many of the protesters and are willing to utilize solidarity as a tactic for achieving the group's goals. There are lawyers that have been working with the collective who are not in the Legal Strategy Group. Among them are:

- Jules Epstein (PA criminal attorney)
- David Rudovsky (Civil Suit guru)
- Roy Zipris (from NLG and Public Defenders office)
- Andy Erba (PA attorney)

The R2K Legal Collective continues to seek lawyers who want to volunteer resources for the defense of the Philadelphia arrestees. The Public Defenders Association (PDA) has three lawyers that are representing most of the arrestees:

- Shawn Nolan (215) 557-4995 [nolanshawn@hotmail.com](mailto:nolanshawn@hotmail.com)
- Bradley Bridge (215) 557-4960
- Meg Flores (215) 557-4960 or (215) 972-4524

the money, please make a donation, contact: [info@r2klegal.org](mailto:info@r2klegal.org)

## Supporters

Letters of support:

[Activist Organizations](#)  
[AFSCME Union](#)  
[APWU Union](#)  
[First Unitarian Church of Philadelphia](#)  
[Members of Congress](#)  
National Association for Socially Responsible Organizations  
[Add yours...](#)

### R2K Mobilization Links:

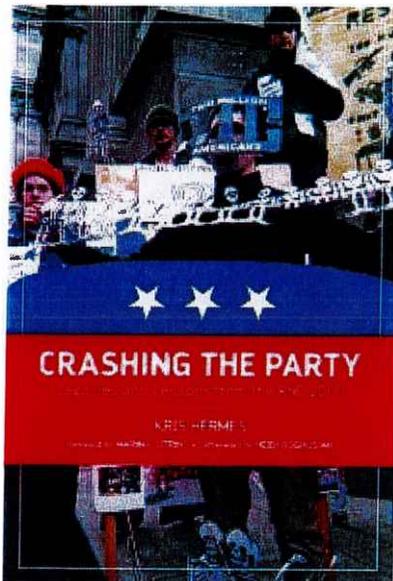
Ad Hoc Committee to Defend Health Care  
[phillyhealth.org](http://phillyhealth.org)  
August 1st Direct Action Coalition  
Kensington Welfare Rights Union  
[kwru.org](http://kwru.org)  
NJ Unity2000  
Philly Direct Action Group  
Redirect2000  
Refuse & Resist  
[refuseandresist.org](http://refuseandresist.org)  
Silent March  
[silentmarch.org](http://silentmarch.org)  
Unity2000

**EXHIBIT EE**

# Guild Notes

Search

## Q&A with Kris Hermes: RNCs, DNCs, and NSSEs—Oh My!



Drawing on first-hand experience and in-depth research, Former Mass Defense Coordinator and longtime Guild member Kris Hermes authored *Crashing the Party: Legacies and Lessons from the RNC 2000* (PM Press, September 2015), which shows how the escalation of the National Security State was already being set in motion during the Republican National Convention protests (RNC) in 2000. The book, with an Afterword by former NLG Executive Director Heidi Boghosian, also documents how dissidents confronted new forms of political repression by pushing legal boundaries and establishing new models of collective resistance. NLG Director of Communications Tasha Moro recently spoke with Hermes about the RNC 2000 and the role of legal activism in today's movements:

**TM:** You attribute a large part of the unprecedented police response to the 2000 RNC protests, including mass arrests, to its National Special Security Event (NSSE) designation. What is an NSSE and how does it affect the right to dissent? Why is political dissent and protest so often conflated now with "terrorism?"

**KH:** The NSSE designation was created under Clinton in the late 1990s for large national events likely to draw political protests—such as the quadrennial RNCs and DNCs—establishes a multi-level law enforcement apparatus with the FBI and the U.S. Secret Service at the top. The NSSE security apparatus includes a hub of communications and intelligence gathering between local, state and federal law enforcement, much like today's Fusion Center or its precursor, the FBI Joint Terrorism Task Force.

A playbook of aggressive anti-free speech policies and police tactics that commonly accompany NSSEs were first developed in Philadelphia during the RNC 2000 by then-Police Commissioner John Timoney. These include passage of anti-protest ordinances, defamation of activists in the media, denial of permits to demonstrate, preemptive raids on activist spaces, unlawful mass arrests, widespread and indiscriminate police violence, political interrogations, excessive bail, and malicious prosecution. Appallingly, municipal governments or hosts of political events will often purchase insurance to indemnify police and public officials against civil rights violations like those listed above.

Despite the fact that today's policing model used against dissidents predates 9/11, the rationale for its use often stems from concerns over terrorism. But, the truth is there aren't a lot of terrorist acts being committed on U.S. soil and, in order to bolster counterterrorism budgets and maintain a multi-billion-dollar industry, blurring the lines between terrorism and dissent offers greater opportunities for government to fund law enforcement equipment, weapons, and personnel.

[Back to nlg.org](#)   [GN Submission Guidelines](#)   [NLG Review](#)

KH: Because of the immense resources and oppressive nature of the state, once dissidents are caught up in the legal system it's not really prudent to rely exclusively on criminal defense attorneys. Legal workers, and law collectives in particular, help establish an important link between the political movements the defendants are part of and the lawyers representing them.

Legal collectives have the unique opportunity to politicize criminal cases, including organizing the defendants to be strategic and bring politics into the courtroom, training defendants to represent themselves pro se, packing the courtroom with supporters, broadcasting calls to "drop the charges," holding demonstrations, and seizing the media narrative.

**TM: The 2016 conventions are coming up in July, with the DNC in Philadelphia and RNC in Cleveland. What kind of turnout do you expect to see from activists and law enforcement?**

KH: I'm excited by the vitality of today's movements and there are plenty of reasons to seize the opportunity to reach millions of people who will be paying attention to the conventions and the media spectacle that surrounds them. I think we can expect more of what we've seen over the past 16 years in terms of an aggressive anti-free speech response by police and government. There are already signs of that in Cleveland with the passage of a restrictive protest ordinance and comments by Deputy Police Chief Wayne Drummond that Black Lives Matter protesters were kept "locked up" because the police "were worried they would get back on the street."

**TM: What was the role of the Guild in the RNC 2000 and how can groups like the NLG further support legal activist movements today?**

KH: The Guild excels at monitoring police behavior through its Legal Observer (LO) program, as well as collecting evidence and testimony to defend protesters in court. In addition to training LOs and dispatching them to protest during the RNC 2000, Guild members also helped staff the legal office which included tracking arrestees and providing support during the jail process. Guild members were also part of the R2K Legal Collective and spent countless hours supporting activists through the trial process.

The Guild should continue to provide legal support by conducting Know Your Rights and LO trainings, gathering evidence, and defending protesters in the courtroom. And in fact, the NLG's Mideast Regional Conference held in March focused heavily on strategizing around legal support during the 2016 RNC. We have an opportunity to work more closely with the movements it supports by strategizing ways to push the legal envelope and bring the political issues into the courtroom to help advance movement goals.

**TM: What was your impetus for writing this book?**

KH: *Crashing the Party* was a labor of love. Although it was heavily researched, I mainly wrote from my personal experience of supporting hundreds of RNC activists through a legal minefield for more than two years. This is part of our political and legal history, and must be told as powerful examples of how much we can and must push back against the legal system.

For more on the author, book, and upcoming events (many of them co-sponsored by the Guild), visit [crashingthepartythebook.com](http://crashingthepartythebook.com). ■

Share this:



Diaspora



**EXHIBIT FF**



# DEFEND THE RNC 420

**WE LOVE YOU SISTERS! WE LOVE YOU BROTHERS!\***

Over 400 people were arrested while protesting at the 2000 Republican National Convention (RNC) in Philadelphia, PA. This website provides information on their legal situation and the issues they are protesting.

## Home

- [Breaking News](#)
- [Breaking News Archive](#)

## R2K Legal

- [Civil Suits](#)
- [Friends of Camilo](#)
- [Lawyers](#)
- [Legal FAQ](#)
- [Legal Forms](#)
- [Legal Statistics](#)
- [Legal Timeline](#)
- [Legal Updates](#)

[/DA Contact](#)  
[Press Releases](#)  
 R2K Legal Contact:  
[info@r2klegal.org](mailto:info@r2klegal.org)  
 Also see [Local Support](#) for contacts in your area.

## Calendar

You can [post](#) trial dates, events, meetings, etc. on the [R2K calendar](#).

## Local Support

Support groups are in the following areas:

- Arcata, CA
- Boston, MA
- Connecticut
- New Jersey
- New York, NY
- Philadelphia, PA
- Providence, RI
- Virginia

**R2K Legal:** [Civil Suits](#) | [Friends of Camilo](#) | [Lawyers](#) | [Legal FAQ](#) | [Legal Forms](#) | [Legal Updates](#) | [Press Releases](#) | [Legal Statistics](#)

## Legal Updates

01/17/01 Update from:  
R2K Legal

## Court Update

A Recusal Motion was filed in front of Judge Seamus McCaffery on Jan 16th by the PD's office regarding statements McCaffery made at a panel discussion at University of Pennsylvania. However, McCaffery did not let any witnesses testify, he did not take the stand, and he denied the motion.

Mark Rifkin and Danielle Redden (two 15th and JFK defendants) filed a supplementary Recusal Motion as pro se defendants. They filed this motion on behalf of all defendants who were to have their cases heard in front of McCaffery. The lawyers also signed on to it. The motion demanded McCaffery's Recusal because of his 20 year term as a police officer, his membership in the FOP (Fraternal Order of Police), his being Grand Marshall of the Daniel Faulkner Memorial Motorcycle Run, and his history of questionable civil disobedience convictions, etc., that lead to the appearance of impropriety or bias.

We were allowed to make limited arguments. McCaffery stated he did not feel he had adequate time to hear our motion, and therefore continued our argument to January 30th in Rm 603 at 1pm. He also stated that the other lawyers COULD NOT sign onto our motion, nor could we file it on behalf of other defendants (which is something that lawyers and pro se litigants are allowed to do all the time).

In Solidarity,  
R2K Legal

Notice: All information is subject to change, it's your responsibility to confirm with [R2K Legal](#).  
[previous.r2klegal.org](http://previous.r2klegal.org)

## About Us

Who are we? The R2K Network. Why are we protesting? Here's some [background](#).

[Add yours...](#)

## Donate

Please help support our Legal Fund for Camille and the Timoney 3 cases. To make a donation, contact: [info@r2klegal.org](mailto:info@r2klegal.org)

## Supporters

Letters of support:

- [Activist Organizations](#)
- [AFSCME Union](#)
- [APWU Union](#)
- [First Unitarian Church of Philadelphia](#)
- [Members of Congress](#)
- National Association for Socially Responsible Organizations

[Add yours...](#)

## R2K Mobilization Links:

Ad Hoc Committee to Defend Health Care  
[phillyhealth.org](http://phillyhealth.org)

**EXHIBIT GG**

DISK  
12-21-01  
1372  
CP0102-344  
417  
070-1105

IN THE MUNICIPAL COURT OF PHILADELPHIA  
COURTROOM 404 CRIMINAL JUSTICE CENTER  
1301 FILBERT STREET

COMMONWEALTH : CHARGES :  
VS. : DISORDERLY  
GEORGE RIPLEY : CONDUCT, PIC  
AND OTHERS SIMILARLY : OBSTRUCTION, CONSP.  
SITUATED :  
: M. C. # 0007-3792

PHILADELPHIA, PENNSYLVANIA  
JANUARY 12th, 2001

BEFORE:

THE HONORABLE JAMES M. DeLEON, JUDGE

PRESENT:

TREVOR BORUM, ESQ.  
ASSISTANT DISTRICT ATTORNEY  
FOR THE COMMONWEALTH

BRENDA FRASER, ESQ.  
UNIVERSITY OF PENNSYLVANIA

30-362 (Rev. 2/87)

PRESENT: (CONTINUED)

BRADLEY BRIDGE, ESQ.  
ASSISTANT PUBLIC DEFENDER  
AND  
MEG FLORES, ESQ.  
ASSISTANT PUBLIC DEFENDER  
FOR GEORGE RIPLEY

ALSO PRESENT:

LAWRENCE KRASNER

30-362 (Rev. 2/87)

3

REPORTED BY:

HEIDI DONALDSON  
OFFICIAL COURT REPORTER

30-362 (Rev. 2/87)

4

(ALL PARTIES SWORN)

COMMONWEALTH'S EVIDENCE

THE COURT: THIS THING  
GOT BOUNCED AROUND AND GOT BOUNCED RIGHT  
BACK TO ME. SO, I'VE DONE SOME RESEARCH ON  
THIS.

LET ME ASK THE UNIVERSITY  
OF PENNSYLVANIA. BASICALLY, IT'S YOUR  
POSITION THAT DIRECT INFORMATION YOU CAN  
GIVE A LIST OF ALL THE STUDENTS THAT ATTEND  
THAT PARTICULAR SCHOOL PERIOD?

MS. FRASER: AT THE  
UNIVERSITY OF PENNSYLVANIA, YES.

THE COURT: I MEAN, OF  
THE MEDICAL SCHOOL PERIOD BECAUSE THE  
UNIVERSITY OF PENNSYLVANIA IS COMPOSED OF  
COLLEGE, YOU HAVE THE COLLEGE OF MEDICINE,  
SOCIAL SCIENCES, WHATEVER.

MS. FRASER: IT'S ALL ONE  
SCHOOL THOUGH.

THE COURT: IT'S ALL ONE  
SCHOOL.

MS. FRASER: IT'S ALL  
CENTRALLY KEPT WITH THE REGISTRAR'S OFFICE.  
WE DON'T HAVE TWELVE DIFFERENT --

30-362 (Rev. 2/87)