

MAR 28 2001

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

BY _____
DEPUTY CLERK

PHILIP RAY WORKMAN)
)
Plaintiff,)
)
v.)
)
PAUL SUMMERS,)
Attorney General Of The State Of)
Tennessee, In His Official)
Capacity;)
)
JOHN CAMPBELL,)
Assistant District Attorney For)
The 30th Judicial District Of Tennessee,)
in His Official Capacity;)
)
)
)
RAY MAPLES,)
)
Member, Tennessee Board)
Of Probation And Parole, In His)
Official Capacity;)
)
)
CHARLES TRAUGHBER,)
Chairperson, Tennessee Board of)
Probation And Parole, In His)
Official Capacity;)
)
)
BILL DALTON,)
Board Member, Tennessee Board)
Of Probation And Parole, In His)
Official Capacity;)
)
)
DON DILLS,)
Board Member, Tennessee Board)
Of Probation And Parole, In His)
Official Capacity;)
)
)

No. 3:01-290

JURY DEMAND

**CAPITAL CASE
EXECUTION DATE
1 A.M. MARCH 30, 2001**

MOTION
FOR EXPEDITED HEARING
AND/OR URGENT
STATUS CONFERENCE

TOWNSEND ANDERSON,)
 Board Member, Tennessee Board)
 Of Probation And Parole, In His)
 Official Capacity;)
)
 SHEILA SWEARINGEN)
 Board Member, Tennessee Board)
 Of Probation And Parole, In Her)
 Official Capacity;)
)
 LARRY HASSELL,)
 Board Member, Tennessee Board)
 Of Probation And Parole, In His)
 Official Capacity;)
)
)
 RICKY BELL,)
 Warden, Riverbend Maximum)
 Security Institution, In His Official)
 Capacity; and)
)
)
 JOHN DOES 1-100)
)
 Defendants)

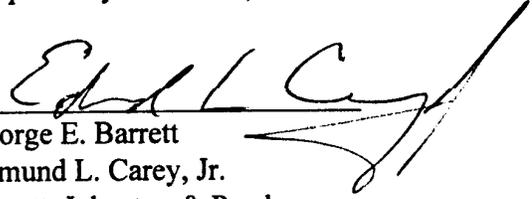
MOTION FOR EXPEDITED HEARING AND/OR URGENT STATUS CONFERENCE

Plaintiff respectfully and urgently requests that the Court consider either convening an immediate status conference, or set an expedited hearing on the pending Motion for Temporary Restraining Order, for all the reasons set forth in the Motion and supporting papers with respect to the irreparable harm at stake. The execution of Plaintiff is scheduled for 1:00 a.m., March 30, 2001, thirty six (36) hours from the time of filing of this pleading. As the Court knows from the record, Plaintiff originally requested an urgent hearing on the Motion before 4:00 p.m. yesterday, Tuesday, March 27, 2001. Judge Echols had the file, and announced his recusal at approximately 12:30 p.m.

March 28, 2001.

March 28, 2001.

Respectfully submitted,



George E. Barrett
Edmund L. Carey, Jr.
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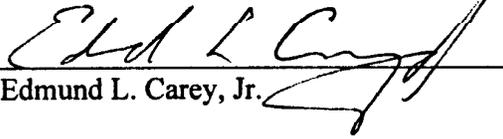


Donald E. Dawson
Christopher M. Minton
Post-Conviction Defender Office
State of Tennessee
530 Church Street -Suite 600
Nashville, TN 37243
(615) 741-9331

Counsel for Plaintiff Philip Ray Workman

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion for Expedited Hearing and/or Urgent Status Conference was served by hand on Paul Summers or his designee, Attorney General, State of Tennessee, 500 Charlotte Avenue, Nashville, TN 37243, this 28th day of March, 2001.


Edmund L. Carey, Jr.