

Philip R. Workman respectfully requests that this Court stay his execution currently set for March 30, 2001, at 1:00 a.m. In support thereof, Workman shows:

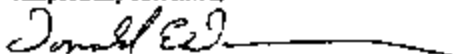
1. Workman has filed with this Court a Motion To Reopen And To Appoint A Special Master;

2. A death sentence cannot be carried out while substantial issues remain outstanding. See Bangfoot v. Eselle, 463 U.S. 880, 888, 103 S.Ct. 3383, 77 L.Ed.2d 1090 (1983). For the reasons expressed in the motion pending before this Court and the memorandum filed in support of that motion, Workman presents this Court substantial issues respecting the propriety of his execution.

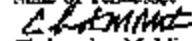
WHEREFORE, Workman respectfully requests that this Court:

1. Stay his March 30, 2001, 1:00 a.m. execution if this Court does not resolve the pending motion prior to that time;
2. Stay his March 30, 2001, 1:00 a.m. execution if this Court grants the pending motion; and
3. Order such other relief as this Court deems just.

Respectfully submitted,



Donald E. Dawson
Post-Conviction Defender
State of Tennessee



Christopher M. Minton
Assistant Post-Conviction Defender

Office of the Post-Conviction Defender
530 Church Street - Suite 600
Nashville, Tennessee 37243
(615) 741-9331

Counsel for Philip Ray Workman
