

IN THE SUPREME COURT OF TENNESSEE

MAR 29 PM 10:04
APPELLATE COURT CLERK
NASHVILLE

PHILIP RAY WORKMAN,
Petitioner,
v.
STATE OF TENNESSEE,
Respondent.

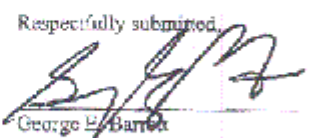
)
)
)
)
) No. 03-2001-00778-SC-OT-PD
) Trial Court Nos. B81209, P3908
) Criminal Court, 30th Judicial District

MOTION FOR LEAVE TO APPEAR AS AMICUS

Associated counsel for Philip Workman, undersigned, seek leave to appear as *amicus curiae* and to file the accompanying motion to clarify one issue of actual innocence that this Court must consider in these appeals.

Actual innocence is the crucial issue, and counsel submit that the accompanying pleading should sharpen the issue for the Court's consideration, and thus assist the Court, a proper role for amici.

March 29, 2001

Respectfully submitted,


George H. Barrett
Edmund L. Carey, Jr.
Barrett, Johnston & Parsley
217 Second Avenue North
Nashville, TN 37201
(615) 244-2202



Cecil D. Branstetter
James G. Stanch, III
Branstetter, Kilgore, Stanch & Jennings
227 Second Ave. North
Nashville, TN 37201
(615) 254-8801

Counsel for Plaintiff Philip Ray Workman