

IN THE
UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

PHILIP R. WORKMAN,)	
)	
Petitioner-Appellant,)	
)	No. 96-6656
)	
RICKY BELL, Warden,)	
)	
Respondent-Appellee,)	
)	
vs: PHILIP R. WORKMAN,)	No. 00-5367
)	
Movant.)	

DEATH PENALTY HABEAS CORPUS PROCEEDING
EXECUTION DATE: 3/30/01 1:00 a.m.

MOTION FOR STAY OF EXECUTION TO ORIGINAL PANEL ON REHEARING AND
TO EN BANC COURT ON SUGGESTION FOR REHEARING EN BANC

Donald E. Dawson
Post-Conviction Defender
State of Tennessee

Christopher M. Minton
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Counsel for Philip Ray Workman

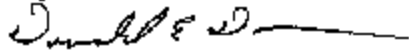
Philip R. Workman respectfully requests that this Court stay his execution currently set for March 30, 2001, at 1:00 a.m. In support thereof, Workman shows:

1. Workman has filed with this Court a motion for rehearing and a suggestion for rehearing en banc;
2. A death sentence cannot be carried out while substantial issues remain outstanding. See Barefoot v. Estelle, 463 U.S. 880, 888, 103 S.Ct. 3383, 77 L.Ed.2d 1090 (1983). For the reasons expressed in the rehearing requests pending before this Court, Workman presents this Court substantial issues respecting the propriety of his execution.

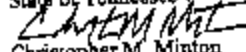
WHEREFORE, Workman respectfully requests that this Court:

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

Respectfully submitted,



Donald E. Dawson
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State of Tennessee


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