

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

BILLY JOE TYLER, et al.,)
)
Plaintiffs,)
)
UNITED STATES OF AMERICA,)
)
Plaintiff-Intervenor,)
)
vs.)
)
RAYMOND PERCICH, et al.,)
)
Defendants.)

DEC 19 1975

WILLIAM D. RUND, Clerk
U. S. DISTRICT COURT
E. DISTRICT OF MO.

Cause No. 74-40-C(2)

MOTION OF THE BAR ASSOCIATION OF METROPOLITAN ST. LOUIS
FOR LEAVE TO FILE MEMORANDUM AS AMICUS CURIAE IN SUPPORT
OF MOTION OF UNITED STATES FOR A RESTRAINING ORDER

Comes now the Bar Association of Metropolitan St. Louis and respectfully moves that the Court grant it leave to file the attached Memorandum as Amicus Curiae in support of the United States' Motion for a Restraining Order. In support of this motion, Movant states:

1. Movant is a pro forma corporation organized and existing under the laws of the State of Missouri with its principal offices located in the City of St. Louis.
2. The membership of Movant is comprised principally of attorneys licensed under the laws of the State of Missouri to engage in the practice of law.
3. The purposes of the Movant include the application of the knowledge and experience of the profession to the promotion of the public good.
4. The issues before the Court involve the legal and constitutional rights of pre-trial detainees and present questions affecting the legal profession and the public good.

5. Movant has engaged in numerous studies involving the confinement of pre-trial detainees, including legal research concerning the rights of pre-trial detainees under the laws and Constitutions of the State of Missouri and the United States of America.

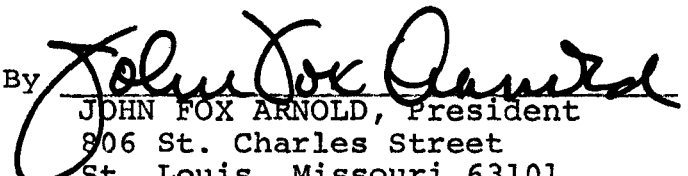
6. The knowledge and experience gained by the Movant through said studies would be of assistance to the Court in deciding the issues now before it.

WHEREFORE, Movant respectfully prays for an order of the Court granting it leave to file the attached Memorandum as Amicus Curiae in support of the United States' Motion for a Restraining Order.

Respectfully submitted,


THE BAR ASSOCIATION OF
METROPOLITAN ST. LOUIS

By


JOHN FOX ARNOLD, President
806 St. Charles Street
St. Louis, Missouri 63101
421-4134

State of Missouri)
) SS.
City of St. Louis)

On the 19th day of December, 1975, before me, a notary public, appeared John Fox Arnold, known to me, and having been duly sworn stated that he is the President of The Bar Association of Metropolitan St. Louis, that the matters alleged in the above Motion are true and correct, and that he has executed this Motion pursuant to the authority of the Executive Committee of The Bar Association of Metropolitan St. Louis as its own free act and deed.


Notary Public

My Term Expires: August 26, 1976

Certificate of Service

I hereby certify that a copy of the foregoing has been mailed, first class, postage prepaid, to the following attorneys of record, this 19th day of December, 1975:

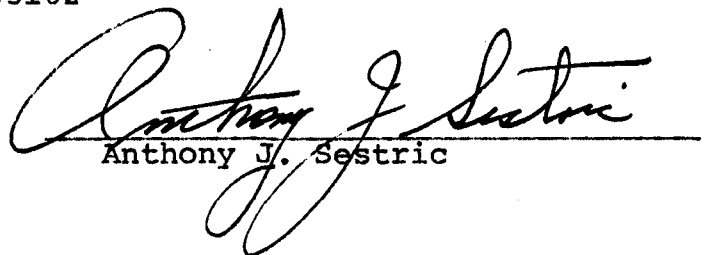
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