



INSTITUTE FOR CONSTITUTIONAL ADVOCACY AND PROTECTION
GEORGETOWN UNIVERSITY LAW CENTER

May 13, 2021

Supreme Judicial Clerk's Office for the Commonwealth
John Adams Courthouse
1 Pemberton Square, Suite 1400
Boston, MA 02108

**Re: *Graham v. District Attorney for Hampden County*, No. SJ-2021-0129,
Letter Motion Seeking Leave to File Amicus Curiae Letter in Support of Petitioners**

Dear Clerk of the Court,

The Institute for Constitutional Advocacy and Protection at Georgetown University Law Center (ICAP) and the Law Enforcement Action Partnership (LEAP) respectfully request leave to participate as amici curiae and to file a letter in support of Petitioners' petition for relief pursuant to Massachusetts General Law chapter 211, section 3, in *Graham v. District Attorney for Hampden County*, No. SJ-2021-0129.

Proposed amici are non-profit organizations that seek to improve the criminal justice system through reforms that advance justice and promote public safety. They have particular expertise in the obligations of prosecutors and law enforcement to provide exculpatory and impeachment information in the possession of the police under *Brady v. Maryland*, 373 U.S. 83 (1963), and its progeny. The proposed amicus curiae letter offers the Court additional perspectives about the critical role that prosecutors and law enforcement play in ensuring that criminal convictions are obtained fairly and in preserving the integrity of the criminal justice system. It also provides information about how the federal government's policies for obtaining potential impeachment information concerning law enforcement witnesses differ significantly from the Hampden County District Attorney's Office's existing practices. Amici believe that these views will aid the Court in its consideration of Petitioners' request for relief.

For the foregoing reasons, ICAP and LEAP respectfully request that this Court grant leave to file a letter in support of Petitioners' petition for relief pursuant to Massachusetts General Law chapter 211, section 3.

Respectfully submitted,

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