

IN THE UNITED STATES COURT OF APPEAL  
FOR THE THIRD CIRCUIT

MUMIA ABU-JAMAL,	)	No. 02-9001
	)	
Appellee/Cross-Appellant,	)	
	)	
vs.	)	
	)	
MARTIN HORN, Director, Pennsylvania De-	)	No. 01-9014
partment of Corrections; CONNER BLAINE,	)	
Superintendent, SCI Greene,	)	
	)	
Appellants/Cross-Appellees.	)	<i>Death Penalty Case</i>
	)	

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**MOTION FOR LEAVE TO FILE OVERSIZED FOURTH-STEP REPLY  
BRIEF OF APPELLEE AND CROSS-APPELLANT, MUMIA ABU-JAMAL**

COMES Mumia Abu-Jamal, Appellee and Cross-Appellant in the above-referenced matter who, through counsel, moves for leave to file an oversized fourth-step brief. In support of this motion, the following is submitted:

In support of this motion, the following is submitted:

1. The fourth-step brief comprises approximately 17,996 words and is 76 pages in length.
  
2. This is a capital case of great complexity involving cross appeals and a voluminous record. The Commonwealth’s Third Step Brief of Appellants contained 20,025 words and 97 pages, while the Brief of Appellee and Cross-Appellant, Mumia Abu-Jamal, contained 25,530 words and 105 pages.

WHEREFORE, Appellee and Cross-Appellant respectfully requests leave to file an oversized fourth-step brief of 17,996 words, and 76 pages..

Dated: October 23, 2006

Respectfully submitted,



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Attorney for Appellee and Cross-Appellant,  
Mumia Abu-Jamal

## CERTIFICATE OF SERVICE

I hereby certify that on this date I caused a true and correct copy of the foregoing Motion for Leave To File Oversized Fourth-Step Reply Brief of Appellee and Cross-Appellant, Mumia Abu-Jamal to be served by e-mail and United States Mail, first class postage prepaid, upon the following:

Hugh J. Burns, Jr., Esquire  
Assistant District Attorney  
District Attorney's Office  
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Philadelphia, PA 19102

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I declare under penalty of perjury that the foregoing is true and correct.

Executed on this the 23<sup>rd</sup> day of October, 2006, at San Francisco, California.



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Mumia Abu-Jamal