

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CITY OF DETROIT, MICHIGAN
and the DETROIT POLICE DEPARTMENT,

Defendants.

No. 03-72258
Hon. Julian A. Boock Jr.

U.S. DIST. COURT CLERK
EAST DIST. MICH.
DETROIT

03 JUL -1 P357

FILED

**COALITION AGAINST POLICE BRUTALITY'S
MOTION FOR INTERVENTION AS OF RIGHT**

NOW COMES the petitioner, COALITION AGAINST POLICE BRUTALITY, by and through its legal counsel, Amos E. Williams, Thomas W. Stephens, Hugh M. Davis, Jr. and Cynthia Heenan of the NATIONAL LAWYERS GUILD – DETROIT CHAPTER, and for its Motion for Intervention As Of Right, states the following:

1. On June 12, 2003, the U.S. Department of Justice filed its Complaint seeking to “remedy a pattern or practice of conduct by law enforcement officers of the Detroit Police Department that deprives persons of rights, privileges, and immunities secured or protected” by the U.S. Constitution and by U.S. law.

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2. At the time of filing its Complaint, the Plaintiff and Defendants filed a Joint Motion asking the court to approve two Consent Judgment documents¹ and another Joint Motion to appoint a monitor seeking to implement the terms of two proposed Consent Judgments.

3. The U.S. Department of Justice began a patterns and practices investigation of the Detroit Police Department in December 2000. The investigation came after the Mayor's Office and the City Council requested an investigation by the U.S. Department of Justice. The City's request came as a result of the efforts of the Coalition Against Police Brutality, individually, and working with the NAACP and Amnesty International.

4. The Coalition Against Police Brutality is dedicated to reform of the Detroit Police Department so as to end unconstitutional conduct including the unlawful use of excessive and deadly force.

5. The Coalition Against Police Brutality's membership is overwhelmingly made up of persons and surviving family members who have suffered injury and the loss of loved ones as the result of the use of unlawful excessive force by the Detroit Police Department.

6. Members of the Coalition Against Police Brutality have pending complaints with the Detroit Police Department against individual officers based on the use of illegal excessive force. These members include Herman Vallery, Arnetta Grable, Jerome Boyce, Juanita Bradley and Milton Craighead.

¹ Entitled "Consent Judgment Conditions of Confinement" and "Consent Judgment Use of Force and Arrest and Witness Detention."

7. Numerous other members of the Coalition Against Police Brutality have had claims against the DPD resolved through the Courts and before the Board of Police Commissioners.

8. The Coalition has given testimony and presented reports at hearings, meetings and conferences organized by U.S. Congressman John Conyers, the NAACP, Detroit City Council, and the Detroit Board of Police Commissioners and many other community and government organizations and officials.

9. FRCP 24 (a)(2), states in part as follows:

Upon timely application anyone shall be permitted to intervene in an action . . . when the applicant claims an interest relating to the . . . transaction which is the subject of the action and the applicant is so situated that the disposition of the action may as a practical matter impair or impede the applicant's ability to protect that interest, unless the applicant's interest is adequately represented by existing parties.

10. The Coalition Against Police Brutality is an organization with an interest in whether the proposed Consent Judgments attain the force of law through the sanction of this Court. The Coalition's interests include:

- a. The interests of individual Coalition members in the complaints which remain pending and under investigation;
- b. An interest of the Coalition in seeing true reform of illegal practices and policies that have been the subject of the U.S. Department of Justice's investigation; and
- c. An interest in seeing citizen and victim input presently permitted under law is not foreclosed by entry of the proposed Consent Judgments.

The Coalition Against Police Brutality's stakeholder interests will be impaired by entry of the proposed Consent Judgments, and the Coalition's interests are not adequately represented by either of the present parties to this litigation.

11. The present action eviscerates the role of community input and may not constitute an actual case or controversy before the court in the absence of the Coalition Against Police Brutality as a party intervenor.

12. In seeking an expedited judicial sanction to the proposed agreements, the parties are seeking to avoid the required input of public stakeholders whose interests are significantly impacted and potentially impaired by the proposed Consent Judgments. At the time of filing the Complaint, the Judgments represented a proposed agreement between the parties. Local law requires that all such contracts and settlements of lawsuits require the approval of Detroit City Council before they become binding against the City. This mechanism of democratic government allows the opportunity for the public to be heard during legislative consideration of the matter.

13. Community input and outreach have been required and integrated into the consent decrees and agreements entered into by the DOJ with police departments in other jurisdictions. If judicially sanctioned, Detroit would virtually stand alone as a jurisdiction where the community of effected persons was completely bypassed by the DOJ in seeking an agreement or judgment to terminate the use of illegal and unconstitutional excessive and deadly force by a police department.

14. The Petitioner respectfully suggests that it would be unwise of this Court to judicially sanction the proposed agreements between the parties without consideration and input from impacted stakeholders such as the Coalition of Police Brutality.

16. Because the Coalition Against Police Brutality has an interest in the proposed Consent Judgments and their interests may be impaired by the present litigation and they are not adequately represented, the Coalition moves for party status as an

intervenor in this case. See proposed Answer of Intervening Defendant Coalition Against Police Brutality attached as Exhibit 1.

17. Alternatively, the Coalition Against Police Brutality requests leave to appear as *amicus curiae* regarding any and all motions to approve in whole or in part, the party's proposed Consent Judgments. See generally Bradley v. Milliken, 828 F.2d 1186, 1194 (6th Cir. 1987).

16. Plaintiff incorporates by reference all additional arguments and supporting documents set forth in the attached Brief In Support Of Motion For Intervention As Of Right.

WHEREFORE, Petitioner prays that this Honorable Court enter an order granting Intervenor status in this pending lawsuit. Alternatively, the Petitioner requests entry of an order granting *amicus curiae* status with leave to file briefs and to participate in hearings regarding any and all motions to approve, in whole or in part, the proposed Consent Judgments.

Respectfully submitted,

NATIONAL LAWYERS GUILD –
DETROIT CHAPTER

BY: 

Amos E. Williams (P39118)

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ATTORNEYS FOR PETITIONER

DATED: July 1, 2003

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

**SEE CASE FILE FOR
ADDITIONAL
DOCUMENTS OR PAGES
THAT WERE NOT
SCANNED**

ORIGINAL

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UNITED STATES OF AMERICA,

Plaintiff,

No. 03-72258

Hon. Julian Cook, Jr.

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CITY OF DETROIT, MICHIGAN
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Defendants.

U.S. DIST. COURT CLERK
EAST DIST. MICH
DETROIT

03 JUL -1 P3 58

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**COALITION AGAINST POLICE BRUTALITY'S
BRIEF IN SUPPORT OF THEIR
MOTION FOR INTERVENTION AS OF RIGHT**

ORAL ARGUMENT REQUESTED

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F.R.C.P., Rule 24(a)(2)Passim

STATE STATUTE

1976 PA 267, MCL 14.261 et. seq.; MSA 4.1800 et seq.13

I. STATEMENT OF THE FACTS

A. Circumstances Of The Present Lawsuit.

On June 12, 2003, the U.S. Department of Justice (DOJ) announced that two agreements had been reached with Detroit's Mayor and the Police Chief thereby ending a 30 month investigation of the Detroit Police Department (DPD). See Press Releases from the DOJ and City of Detroit, Office of the Mayor attached as Exhibits 1 & 2. The two proposed agreements were signed by representatives of the DOJ, the Detroit Mayor's Office and the Detroit Police Department on or about June 11, 2003. A public announcement of the agreements was made at a June 12, 2003 press conference conducted by the Assistant U.S. Attorney General for Civil Rights Ralph F. Boyd, Jr., U.S. Attorney for the Eastern District of Michigan Jeffrey G. Collins, Detroit Mayor Kwame Kilpatrick, and Detroit Police Chief Jerry Oliver. See news coverage of the press conference attached as Exhibit 3.

Also on June 12, 2003, after reaching the negotiated agreements with the Mayor and the DPD, the DOJ filed a Complaint in this Honorable Court against the City of Detroit and the Detroit Police Department. Simultaneously, the DOJ filed a Motion to Appoint a Monitor and a Motion to have the two agreements be entered by this Honorable Court as Consent Judgments.

The Coalition Against Police Brutality has been sought for commentary by print and television news organizations as a result of the announcements of the agreements and court filings. See print news coverage since June 12, 2003, attached as Exhibit 4.

B. Origination Of The DOJ Investigation & The Role Of The Coalition Against Police Brutality.

In September of 2000, then Mayor Dennis Archer and City Council called for a patterns and practices investigation of the Detroit Police Department by the DOJ. See news report and Mayor's Press Release attached as Exhibit 5. The Detroit City Council specifically recognized and commended the Coalition Against Police Brutality's efforts to bring the issue of police brutality before City government and the public at large. City Council conducted hearings at the behest of the Coalition and ultimately passed a resolution which reads, in part, as follows:

WHEREAS, The Coalition Against Police Brutality has consistently and vigorously brought this problem to the attention of the Detroit City Council since 1998 seeking redress, and

WHEREAS, The United States Department of Justice has authority to address a pattern or practice of conduct by law enforcement officers that deprives people of rights, privileges and immunities preserved by the Constitution, pursuant to 42 United States Code, Sec. 14141. The Violent Crime and Control Act of 1994. NOW THEREFORE BE IT

RESOLVED, The City Council hereby respectfully requests the United States Justice Department . . . conduct an Investigation into the practices and procedures of the City of Detroit Police Department regarding its use of deadly force on citizens . . .

See Resolution attached as Exhibit 6.

As recognized at the time of the City's requests for an investigation by the DOJ, the Coalition Against Police Brutality had been active for many years advocating for reform of the DPD regarding their patterns and practices resulting in illegal police brutality against Detroit citizens. In 1998 the Coalition submitted a lengthy and well-documented report regarding the epidemic of police brutality in the City of Detroit. See

Report attached as Exhibit 7. The 1998 report was submitted in conjunction with public hearings by the Coalition before City Council detailing the existing problems within the DPD and providing recommendations for reform. The report noted that Detroit ranked high among urban areas in the amount of money being paid to settle police brutality lawsuits and that the DPD was one of the leading departments involved in fatal police shootings. Despite this evidence, disciplinary action against involved officers was far too often perfunctory and nonexistent.

C. The Coalition Against Police Brutality's Advocacy For DPD Reform.

The Coalition Against Police Brutality is an organization dedicated to reform of the Detroit Police Department to end unconstitutional behavior including the use of unlawful excessive and deadly force. Towards this end, the Coalition called for and gave testimony at hearings, meetings and conferences organized by U.S. Congressman John Conyers, Detroit City Council, the NAACP and the Detroit Board of Police Commissioners. The Coalition Against Police Brutality was also invited as a responsible stakeholder to participate in a Citizens Review Panel organized by former Police Chief Benny Napoleon to review the DPD's use of deadly force.¹ See news report attached as Exhibit 8.

The Coalition Against Police Brutality's membership is overwhelmingly made up of persons and surviving family members who have suffered injury and the loss of loved ones as the result of the use of unlawful excessive force by the Detroit Police Department.

¹ The Coalition declined to participate in the panel due to disagreements with the administration regarding its progress on resolving outstanding issues, the makeup of the panel and other matters.

Additionally, members of the Coalition Against Police Brutality have filed complaints with the Detroit Police Department against individual officers based on the use of illegal excessive force and their complaints remain pending and under investigation by the DPD. These members include Herman Vallery, Arnetta Grable, Jerome Boyce, Juanita Bradley and Milton Craighead.

In short, the Coalition Against Police Brutality is the leading community organization with a stakeholder interest in the issues presented by the proposed Consent Judgments. If not for the efforts of the Coalition Against Police Brutality, individually and in partnership with other organizations such as the Detroit Chapters of the NAACP and Amnesty International, it is unlikely that the DOJ would have undertaken their investigation or that the DPD would have been compelled to reform.

II. DISCUSSION

A. THE COALITION AGAINST POLICE BRUTALITY IS A PROPER INTERVENING PARTY WITH INTERESTS THAT ARE IMPAIRED BY THE PROPOSED CONSENT JUDGMENTS.

The Federal Rules of Civil Procedure, Rule 24(a)(2) states:

“Upon timely application anyone shall be permitted to intervene in an action . . .when the applicant claims an interest relating to the . . . transaction which is the subject of the action and the applicant is so situated that the disposition of the action may as a practical matter impair or impede the applicant’s ability to protect that interest, unless the applicant’s interest is adequately represented by existing parties.”

FRCP 24(a)(2) contains three elements that must be satisfied before intervention shall be granted. The three elements are summarized as follows:

- 1) An interest relating to the transaction;
- 2) Disposition of the action may impair the applicant's interest; and
- 3) The applicant's interest is not adequately represented by the existing parties.

The Coalition Against Police Brutality has several significant interests that are potentially impaired by the proposed Consent Judgments, and the Coalition's interests are not adequately represented by the existing parties.

i. The Coalition Against Police Brutality Has A Significant Protectable Interest In The Subject Action.

Potential intervenors must show a "significantly protectable interest" under FRCP 24. See Donaldson v. U.S., 400 U.S. 517, 531 (1971). However, as stated in Blake v. Pallen, 554 F.2d 947, 952 (9th Cir. 1977), no specific legal or equitable interest is required. In Blake, the court recognized:

No clear definition has been established by the Supreme Court or the lower courts for the "interest relating to the property or transaction which is the subject of the action " that is required for intervention of right. However, several courts, including this one, have, implicitly at least, **rejected the notion that Rule 24(a)(2) requires "a specific legal or equitable interest."**

Id. (Citations omitted and emphasis added).

In Michigan State AFL-CIO v. Miller, the Sixth Circuit Court of Appeals interprets the interest requirement of FRCP 24(a)(2) similar to the Ninth Circuit's ruling in Blake v. Pallen. The Sixth Circuit held:

This circuit has opted for a rather expansive notion of the interest sufficient to invoke intervention of right. See Purnell, 925 F.2d at 948; Bradley v. Milliken, 828 F.2d 1186, 1192 (6th Cir. 1987) ("This court has acknowledged that 'interest' is to be construed liberally."). We have, for

example, noted that an intervenor **need not have the same standing necessary to initiate a lawsuit**, Purnell, 925 F.2d at 948, and **cited with approval decisions of other courts "rejecting the notion that Rule 24(a)(2) requires a specific legal or equitable interest."** The inquiry into the substantiality of the claimed interest is necessarily fact-specific.

103 F.3d 1240, 1245 (6th Cir. 1997) (Emphasis added). See also Grutter v. Bollinger, 188 F.3d 394, 398 (6th Cir. 1999).

Consistent with the Sixth Circuit's interpretation of the interest's requirement, the court in Smuck v. Hobson 408 F.2d 175, 179 (D.C.Cir. 1969) observed that ultimately, the interest requirement is more of a prerequisite than a determinative criteria. Civil rights organizations have been found to have a sufficient interest to intervene under Rule 24(a)(2). In United States v Allegheny-Ludlum Industries, Inc., the court recognized that the National Organization for Women claimed a sufficient interest under FRCP 24(a)(2) to support intervention in a lawsuit filed by the federal government against steel companies based on discrimination in their hiring practices. 517 F.2d 826, 845 (5th Cir. 1975) (Intervention was ultimately denied due to the failure to satisfy the other two prongs of Rule 24(a)(2)) *cert den* 425 U.S. 944 *and later app* 553 F.2d 451 *reh den* 559 F.2d 1218 and *cert den* 435 U.S. 914. Likewise, in an action by contractors challenging the Public Works Employment Act which required a 10 percent set aside for minority contractors on projects receiving a federal grant, the court found that various civil rights groups including the Los Angeles Chapter of the NAACP had sufficient interests to support intervention. Associated General Contractors v Secretary of Commerce of United States Dept. of Commerce, 459 F.Supp 766, 771 (C.D. Cal 1978). See also Grutter v. Bollinger, 188 F.3d 394 (6th Cir. 1999); Adams v Mathews,

175 App DC 390, 536 F2d 417, 418 (1976); and South Dakota Farm Bureau, Inc. v. South Dakota, 189 F.R.D. 560, 564 (D.S.D. 1999).

The Coalition Against Police Brutality has significant interests in the present lawsuit. Most notably:

1. The Coalition is made up of persons and family members of citizens who have been the victims of police brutality in the City of Detroit. The Coalition's members also have pending complaints against the Detroit Police Department that remain under review.
2. The Coalition is the leading civil rights organization addressing reform of the DPD regarding patterns and practices resulting in unlawful use of force and violation of citizens civil rights. The Coalition has a narrowly focused and significant advocacy interest on behalf of victims of police brutality.
3. The Coalition represents citizens with a direct interest in citizen input concerning reforms at the DPD. On numerous occasions, the Coalition has appeared before City Council and the Board of Police Commissioners to voice citizen input concerning the issues presented by the proposed Consent Judgments. As discussed more fully below, this lawsuit seeks to cut-off legally required opportunities for citizen input.

ii. The Coalition Against Police Brutality Interests Will Be Impaired By The Proposed Consent Judgments.

Once an applicant shows a sufficient interest in the subject transaction, the applicant is required to show that disposition of the lawsuit might impair or impede the applicant's ability to protect that interest. The "impair or impede" requirement mandates a

showing that the interest holder be injured in a practical sense. As held in Michigan State AFL-CIO v. Miller, “this burden is minimal.” 103 F.3d at 1247. (Emphasis added).

The Coalition Against Police Brutality’s interests may be significantly and irreversibly impaired by entry of the proposed Consent Judgments. The proposed Consent Judgments require a complete overhaul of the DPD’s policies and practices regarding processing of citizen Complaints, use of force, arrest, detention, etc. The new policies and practices are not specified in the proposed Consent Judgments and are to be developed exclusively within the DPD with oversight from the parties’ predetermined monitor. The proposed Consent Judgments make no provision for the impact of revised policies and practices upon complaints pending within the DPD; make no provision for input of or outreach to citizens regarding the policies and practices that are to be developed by the DPD as required by the Consent Judgments; and makes no provision for the right of citizen input as exists under current law (more fully detailed below).

iii. The Coalition Against Police Brutality’s Interest Is Not Adequately Represented By The Existing Parties.

In Michigan State AFL-CIO v. Miller, the Sixth Circuit Court of Appeals recognized that:

Although a would-be intervenor is said to shoulder the burden with respect to establishing that its interest is not adequately protected by the existing parties to the action, this burden “is minimal because it is sufficient that the movant prove that representation may be inadequate.” Linton, 973 F.2d at 1319.

103 F.3d at 1247. (citations omitted). The Coalition’s interests are not adequately represented in the present lawsuit. Despite being the leading advocacy group in Detroit for approximately the past decade, at no time was the Coalition contacted by the parties

for the Coalition's input concerning the proposed judgments, no community hearings were held and no avenues were open for victims, citizens or citizens groups to express their concerns regarding the proposed Consent Judgments.

The Sixth Circuit Court of Appeals further recognizes that:

One is not required to show that the representation will in fact be inadequate. For example, it may be enough to show that the existing party who purports to seek the same outcome will not make all of the prospective intervenor's arguments.

Id.

There is no question that the parties will not make the same arguments as the Coalition Against Police Brutality. The parties already have an agreement and will not be advocating positions other than as stated in their proposed Consent Judgments. In this case, it is anticipated that no party will advocate for monitoring of the proposed Consent Judgments by citizens groups, for appointment of citizen's advocates to the Compliance Review Committee regarding detention facilities, or for the appointment of a Compliance Review Committee, with citizen's advocate appointees, regarding the use of force reforms. Furthermore, no parties have objected to or voiced reluctance in granting the Mayor alone the broad authority vested under the proposed Consent Judgments. The Coalition requests the opportunity to advocate these positions and others, so that this Honorable Court will be fully informed before the entry of any proposed Judgments in this case.

Furthermore, collusion between the parties is a ground for finding that a petitioner's interest is not adequately represented by the parties. Collusion between may be shown by the fact that the parties had already come to an agreement before suit was

even filed and that no efforts for citizen or community input have occurred or been put forward. Where the existing parties do not have an a difference of opinion on the issues, the checks and balances of the adversarial process are not employed to ferret out a full exposition of the issues in this case.

B. THE PROPOSED CONSENT JUDGMENTS ILLEGALLY SEEK TO EXCLUDE COMMUNITY INPUT AND CONSIDERATION.

Before the City of Detroit can enter into binding settlements, the proposed settlement must be brought before the City's legislative body, the Detroit City Council. Detroit City Charter, Sec. 6-403. Furthermore, the City Charter at Sec. 4-122 and the Detroit City Code at Sec. 18-5-5 require that contracts, such as the one sought for the Consent Judgments' monitor, be approved by the City Council.

All meetings and deliberations of the City Council regarding approval of settlements and contracts require compliance with the open meetings act. The City Code reads as follows:

All business which the city council may perform shall be conducted at a public meeting held in compliance with the open meetings act, 1976 PA 267, MCL 14.261 et. seq.; MSA 4.1800 et. seq.

Detroit City Charter, Sec. 4-102.

Additionally, the proceedings of City Council permit an opportunity for citizens and community groups to be heard in a manner that did not occur during the parties' negotiations of the proposed Consent Judgments and is not permitted by the nature of judicial proceedings.

Detroit citizens have the right to address City Council on subjects brought before the Council. The Rules And Order of Business Of City Council state:

Rule 40

A person shall be permitted to address a meeting of the City Council or City Council sitting as a committee of the whole subject to the following rules:

1. A brief written notice of a request the City Council shall be filed with the City Clerk . . .
2. A written notice of a request to address the City Council shall identify the person making the request and shall state the subject matter on which such person wishes to address the City Council.

The parties should not be permitted to escape the democratic strictures of Detroit's City Charter and City Code by seeking a sanction of their private agreements in a nonadversarial proceeding by this Honorable Court. Democratic processes require more.

The parties' actions suggest a belief that the democratic input of citizens and meaningful police reform are incompatible. However, the Petitioner believes that meaningful police reform can only occur with the input of the impacted communities through compliance with the democratic processes required by law.

C. IN THE ABSENCE OF THE COALITION AGAINST POLICE BRUTALITY AS A PARTY INTERVENOR, THERE MAY BE NO CASE OR CONTROVERSY BEFORE THE COURT.

Under Article III of the U.S. Constitution, the judicial power of federal courts is constitutionally restricted to "cases" and "controversies." Flast v. Cohen, 392 U.S. 83 (1968). As stated in Aetna Life Ins. Co. v Haworth, 300 U.S. 227, 241 *reh den* 300 U.S. 687 (1937) (Citations omitted):

"controversy" in this sense must be one that is appropriate for judicial determination. A justiciable controversy is thus distinguished from a difference or dispute of a hypothetical or abstract character; from one that is academic or moot. The controversy must be definite and concrete, touching the legal relations of parties having adverse legal interests.

It must be a real and substantial controversy admitting of specific relief through a decree of a conclusive character, as distinguished from an opinion advising what the law would be upon a hypothetical state of facts. Where there is such a concrete case admitting of an immediate and definitive determination of the legal rights of the parties in an adversary proceeding upon the facts alleged, the judicial function may be appropriately exercised although the adjudication of the rights of the litigants may not require the award of process or the payment of damages.

While the law presents a relaxed standard for the cases and controversies requirement in matters seeking a declaratory judgment or injunctive relief. The cases and controversies requirement is however not eliminated in such contexts. In the present case, this Court is being asked to enter the proposed Consent Judgments so as to give the proposed private agreements the force of law. If the case is being presented to the court solely to achieve a political solution that might be impeded by the democratic requirements of local law, then in the absence of parties such as the Coalition Against Police Brutality, there may very well be no existing case or controversy.

CONCLUSION

Meaningful police reform can only occur with the input of the effected communities. The Coalition Against Police Brutality is the leading organization dedicated to the end of unlawful use of force by the Detroit Police Department. The Coalition has timely filed its Motion for Intervention As of Right; has a substantial interest in this lawsuit; has interests that will be materially prejudiced by entry of the proposed Consent Judgments; and the Coalition's interests are not adequately represented by the existing parties. As a result, the Coalition Against Police Brutality requests that it be granted intervenor status in this case, or in the alternative, that the Coalition be granted

status as *amicus curiae* for briefing and hearings regarding the existing parties' Motion to approve the proposed Consent Judgments.

Respectfully submitted,

NATIONAL LAWYERS GUILD –
DETROIT CHAPTER

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U.S. DIST. COURT CLERK
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CERTIFICATE OF SERVICE

Jillian R. Williams, states under the penalties of perjury that on this 1 day of July, 2003 she served a copy of the *Coalition Against Police Brutality's Motion for Intervention as of Right and Brief In Support of Coalition Against Police Brutality's Motion for Intervention as of Right* along with this *Certificate of Service* upon:

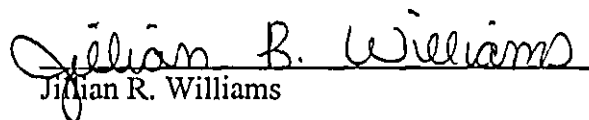
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by hand delivery to their respective offices, and upon

Ralph F. Boyd, Jr.
U.S. Dept. of Justice
950 Pennsylvania Ave., NW
Washington, DC 20530

by enclosing a copy of said documents in envelopes properly addressed, with postage prepaid thereon, certified/return receipt U.S. Mail.


Julian R. Williams

General Information

Court	United States District Court for the Eastern District of Michigan; United States District Court for the Eastern District of Michigan
Federal Nature of Suit	Civil Rights - Other[440]
Docket Number	2:03-cv-72258
Status	CLOSED