

No. 26-5558

IN THE
Supreme Court of the United States

LEJAMES NORMAN,
Petitioner,

v.

TEXAS,
Respondent.

ON PETITION FOR A WRIT OF CERTIORARI TO
THE COURT OF CRIMINAL APPEALS OF TEXAS

**MOTION FOR LEAVE TO FILE PETITION FOR WRIT OF
CERTIORARI UNDER SEAL WITH REDACTED COPIES FOR THE
PUBLIC RECORD**

Petitioner LeJames Norman respectfully seeks leave to file his petition for a writ of certiorari under seal with redacted copies for the public record.

Norman's petition for writ of certiorari relies in part on grand jury testimony. That testimony contains critical factual support for his due process claim. Under Texas law, grand jury proceedings are to remain secret. Tex. Code. Crim. Proc. art. 20A.202. Under some situations, those proceedings are disclosed to defense counsel or other individuals. *Id.* at art. 20A.204–05. When that occurs, those individuals

possessing that material must still maintain its confidentiality. *Id.* at art. 20A.203–05.

In light of these requirements, Norman requests permission to file his petition for writ of certiorari under seal with redacted copies for the public record. That will permit him the opportunity to utilize the important information contained within the grand jury proceedings while respecting Texas’s secrecy statute. The redacted public copies balance the competing needs between public notice of court activity with Texas’s grand jury secrecy provisions.

Respectfully submitted,

JASON D. HAWKINS
Federal Public Defender

/s/ Jeremy Schepers
Jeremy Schepers*
Supervisor, Capital Habeas Unit

Office of the Federal Public Defender
Northern District of Texas
525 S. Griffin St., Ste. 629
Dallas, TX 75202
214-767-2746
jeremy_schepers@fd.org

/s/ Karl Schwartz
Karl Schwartz
Wiseman, Schwartz,
Cisochi & Trama, LLP
718 Arch Street, Suite 718 N
Philadelphia, PA 19106
(215) 450 - 3391

**Counsel of Record*