

NATIONAL COMMITTEE
FOR
SEXUAL CIVIL LIBERTIES

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LITIGATION PROJECT

April 29, 1980

Paula Rosin
Assistant Public Defender
Appellate Division
Department of Public Defender
Providence County Courthouse
Providence, Rhode Island 02903

Re: State v. Santos

Dear Paula,

As I mentioned to you in our recent telephone conversation, the Litigation Project of the National Committee for Sexual Civil Liberties is holding a meeting in New York City to discuss the Santos case and a related case recently decided by the Court of Special Appeals in Maryland with facts and issues similar to the Santos case. Since the Rhode Island Supreme Court has just denied your Petition for Reconsideration, we must begin our plans for filing a Petition for Certiorari in the U.S. Supreme Court.

The meeting will either be on May 27 or May 28 at the Law Offices of Melvin Wulf and Ramsey Clark, 113 University Place, New York City, telephone number 212/475-3232.

In addition to Arthur Warner, Melvin Wulf, and Ramsey Clark, we are inviting the following persons to attend and participate in the meeting:

William Gardner, Esq. of Buffalo, New York
Margot Karle, Esq. of New York City
Professor Welsh White of Pittsburgh
Professor David Richards of New York University
Dean Heckle of Rutgers University
Alan Silber, Esq. of New Jersey
Robert Warfield, Esq. of Severna Park, Maryland.

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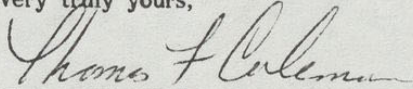
Each of these persons has special expertise in the area of challenging the constitutionality of sodomy laws, and will hopefully agree to participate in litigation before the U.S. Supreme Court in the Santos case. A copy of this letter is being sent to each of those individuals as a written confirmation of the meeting.

We will contact each person by telephone to confirm the exact date and time of the meeting.

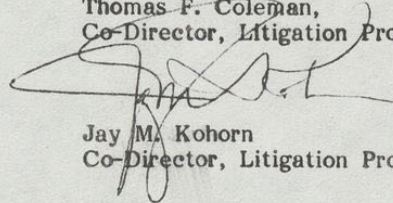
I am enclosing a copy of the Opinion of the Court of Special Appeals of Maryland in the case of Kelly v. State of Maryland for your review. We are also enclosing, for the benefit of the other persons receiving a copy of this letter, the relevant portion of the Rhode Island Supreme Court Opinion in State v. Santos.

We look forward to meeting you in person and discussing the issues and strategy for the Santos case. If it is possible for your associate to attend the meeting with you, that would be helpful.

Very truly yours,



Thomas F. Coleman,
Co-Director, Litigation Project



Jay M. Kohorn
Co-Director, Litigation Project

/mbo

Enclosure

cc: Mr. Melvin Wulf
Mr. Ramsey Clark
Mr. Bill Gardner
Ms. Margot Karle
Prof. Welsh White
Prof. David Richards
Dean Heckel
Mr. Alan Silber
Dr. Arthur Warner
Mr. Robert Warfield