

IN THE UNITED STATES SUPREME COURT

IN THE MATTER OF THE APPEAL OF:)
) Case No.
Henderson v. Taylor)
) **File Under Seal**

Affidavit in Support of
Counsel Suppressing Relevant
Information

I, Sylvia Jackson, being first duly sworn, hereby depose and state as follows:

Background Information Given to Defense Suppressed at Trial

I lived next door to Marcus Henderson's family for over twenty years. Marcus was beaten with belts, shoes, and once with a broom handle. His father would lock him in the basement overnight as punishment. I reported this once to child protective services but nothing was done. Marcus never had friends over. His brother drank and fought constantly. I told his lawyers this before his trial, but they never asked for any more information. Marcus has dealt with a lot during his life. I believe that this information needs to be considered by the court in addressing his appeal.

Sworn on this day, February 1, 2004

Client Note:

This affidavit was collected during the appeals process.