

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

KANAUTICA ZAYRE-BROWN,

Plaintiff,

v.

NORTH CAROLINA DEPARTMENT
OF ADULT CORRECTION, et al.,

Defendants.

No. 3:22-CV-191

**PLAINTIFF'S MOTION FOR ORDER FOR WRIT OF HABEAS CORPUS AD
TESTIFICANDUM**

Counsel of Plaintiff respectfully moves the Court to Order a Writ of Habeas Corpus Ad Testificandum for Plaintiff, Kanuatica Zayre-Brown. Mrs. Zayre-Brown (DOB: 9/23/1981, Offender ID: 0618705) is in the custody of the North Carolina Department of Adult Correction. Plaintiff is currently held at Center for Community Transitions. An evidentiary hearing in the above captioned matter is scheduled before this Court for February 20, 2024 at 2:00 PM. Following consultation, Plaintiff's counsel learned that the NC Department of Adult Correction will not permit Mrs. Zayre-Brown to attend the evidentiary hearing in her case absent the issuance of a writ, despite her community placement. Counsel for Plaintiff makes this request so that Mrs. Zayre-Brown may attend the evidentiary hearing in her case and answer to the Court if her testimony is desired.

WHEREFORE, Plaintiff, through counsel, moves this Court to issue a Writ of

Habeas Corpus Ad Testificandum to NC's Department of Adult Correction, requiring that Mrs. Zayre-Brown be produced before this Court on February 20, 2024, at 2:00 PM, for an evidentiary hearing.

Respectfully submitted this the 12th day of February, 2024.

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CERTIFICATE OF SERVICE

I certify that on February 12, 2024, I electronically filed the foregoing document using the ECF system, which will send notification of such filing to all counsel of record.

/s/ Jaclyn A. Maffetore
Jaclyn A. Maffetore
Counsel for Plaintiff