

IN THE  
**SUPREME COURT OF THE UNITED STATES**

OCTOBER TERM, 2018

NO. \_\_\_\_\_

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EARLE D. WILLIAMS , Petitioner

vs.

STATE OF CALIFORNIA, Respondent

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**MOTION FOR LEAVE TO FILE  
IN FORMA PAUPERIS**

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KIERAN D. C. MANJARREZ  
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1535 Farmers Lane 133  
Santa Rosa, CA 95405  
Tel: 415 / 520-0440  
[CBN: 62000]

Attorney for Petitioner

IN THE  
**SUPREME COURT OF THE UNITED STATES**

OCTOBER TERM, 2018

NO. \_\_\_\_\_

EARLE D. WILLIAMS, Petitioner

vs.

STATE OF CALIFORNIA, Respondent

TO THE HONORABLE CHIEF JUSTICE AND ASSOCIATE JUSTICES OF  
THE SUPREME COURT OF THE UNITED STATES:

Pursuant to rule 39 of the Rules of the Supreme Court of the  
United States, petitioner, EARLE D. WILLIAMS, by and through counsel,  
respectfully requests leave to file a petition for writ of certiorari in *forma  
pauperis*. Counsel's affidavit in support of this motion is attached hereto.

Dated: 12 December 2018

Respectfully submitted,

/s/kcmanjarrez

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Kieran D. C. Manjarrez  
Attorney for Petitioner

EARLE D. WILLIAMS,  
Petitioner

vs.

STATE OF CALIFORNIA.  
Respondent

**AFFIDAVIT OF COUNSEL  
IN SUPPORT OF  
MOTION TO PROCEED  
IN FORMA PAUPERIS  
[Rule 39]**

I, KIERAN D. C. MANJARREZ, declare under penalty of perjury as follows:

1. I am an attorney licensed to practice in the State of California and a member of this Court's bar with bar number 62000

2. On 7 April 2016, I was appointed by the Second District Court of Appeal, in Los Angeles, California, to provide indigent, appellate representation to petitioner herein, EARLE D. WILLIAMS. Said appointment included the filing of a petition for review in the California Supreme Court. A copy of said appointment order is attached hereto as Exhibit A and incorporated herein by reference.

3. Petitioner's notice of appeal was accompanied by petitioner's pro per declaration of indigence and motion for appointment of counsel on appeal. A copy of said motion is attached hereto as Exhibit B and incorporated herein by reference. Prior to that page 77 of the Clerk's Transcript on Appeal indicates that the alternate public defender was

appointed on 24 April 2015 to represent petitioner at trial

4. At all relevant times, petitioner has remained in custody of the California Department of Corrections and is currently incarcerated in the California Substance Abuse Treatment Facility, at 900 Quebec Avenue, Corcoran, CA 93212 with inmate number AY7866.

5. On the basis of allegations 2 through 4, I am informed and do believe that petitioner is without funds to hire legal representation and is unable to pay the costs of or give security for his petition for a writ of certiorari.

6. I have prepared the instant petition for certiorari *pro bono publico* without compensation from petitioner or from any source.

I state that all of the foregoing is true and correct to the best of my knowledge and belief and that, as to any matter stated on information or belief, I believe said matter to be true and correct.

Sworn this 12<sup>h</sup> day of December 2015 at, Santa Rosa, California.

/s/kcmanjarrez  
Kieran D. C. Manjarrez  
Attorney at Law

**EXHIBIT A**

IN THE  
COURT OF APPEAL OF THE STATE OF CALIFORNIA  
SECOND APPELLATE DISTRICT  
DIVISION 1

COURT OF APPEAL – SECOND DIST.

**FILED**

Apr 07, 2016

JOSEPH A. LANE, Clerk

ccassidy Deputy Clerk

PEOPLE OF THE STATE OF CALIFORNIA

vs.

EARL D. WILLIAMS

B269049

LOS ANGELES No. MA064979

THE COURT:

Pursuant to appellant's request for appointment of counsel, and under the authority of Penal Code Section 1240, subdivision (a)(1), the following attorney is appointed counsel for appellant on this appeal:

KIERAN D. MANJARREZ

Appellant's opening brief shall be filed within thirty days from the date of this order.

Appellant is directed to keep the court informed of his/her mailing address at all times. If you move, you MUST notify the clerk of this court immediately; otherwise you may not receive important notices concerning your appeal.

**ROTHSCHILD, P.J.**

Presiding Justice

Attorney's Address:

KIERAN D. MANJARREZ (62000)

1535 Farmers Lane

#133

Santa Rosa, CA 95405

Attorney's Phone:

(415) 520-0440

Appellant's Address:

EARL D. WILLIAMS AY-7866

Wasco State Prison (Facility B)

P.O. Box 5500, B4 A 213

Wasco, CA 93280-5500

**EXHIBIT B**

Received 12-16-15 203  
Dkt A19

Earl Williams  
Date of Birth: 10/17/1953  
Booking Number: 4188754

**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF LOS ANGELES

DEC 16 2015

In propria persona

Sherri R. Cotten, Executive Officer/Clerk  
By Robin Brown, Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES

THE PEOPLE OF THE STATE OF CALIFORNIA,

No. MA064979

Plaintiff,

v.

Earl Williams,

Defendant.

NOTICE OF APPEAL  
FROM JUDGMENT OF  
CONVICTION & REQUEST  
FOR APPOINTMENT OF  
COUNSEL ON APPEAL

TO : THE CLERK OF THE COURT, DEPARTMENT A-17

PLEASE TAKE NOTICE that defendant earl Williams, in propria persona, hereby appeals  
the <sup>trial</sup> ~~trial~~ and sentence imposed in the above-entitled matter in the above-entitled court, on 12-16-15

FURTHER, PLEASE TAKE NOTICE that defendant Earl Williams is indigent and has no  
assets with which to retain counsel to represent him and hereby requests the court to appoint an  
attorney to represent him on appeal.

Earl Williams  
Earl Williams, in persona propria