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IN THE
SUPREME COURT OF THE UNITED STATES

TELISA DE'ANN BLACKMAN,
Petitioner

vs.

LORIE DAVIS, DIRECTOR, TEXAS DEPARTMENT OF CRIMINAL
JUSTICE, CORRECTIONAL INSTITUTIONS DIVISION,
Respondent

MOTION FOR LEAVE TO PROCEED
IN FORMA PAUPERIS

TO THE HONORABLE JUSTICES OF UNITED STATES SUPREME COURT:

COMES NOW Telisa De'Ann Blackman, Petitioner, and seeks leave to proceed *in forma pauperis* in this court in regard to her petition for writ of *certiorari* and thereafter, if the writ is granted, and for cause would show the court as follows:

I.

The Petitioner is currently in the custody of the Institutional Division of the Texas Department of Criminal Justice, in the Mountain View Unit, in Gatesville, Texas. Petitioner has been in the custody of the State of Texas since the date of her conviction and imposition of sentence, on September 30, 1998. Petitioner's sentence was Life in the Institutional Division of the Texas Department of Criminal Justice,

a fine of \$10,000 plus costs of court. Petitioner has been incarcerated since the date of her conviction. The Petitioner does not have any assets and does not have any income, and has not had any income since she was taken into custody as the result of the conviction and sentence in this case.

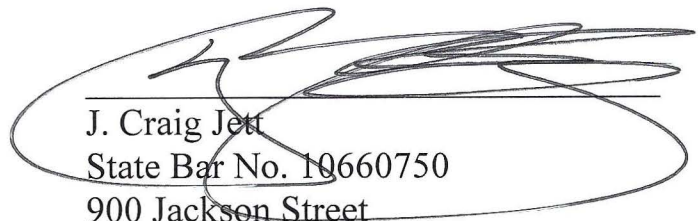
II.

The undersigned counsel was initially hired by Petitioner's mother to represent the Petitioner in post-conviction, post-appellate and subsequent writ proceedings in Texas state courts. After the conclusion of Petitioner's state writ proceedings, Petitioner filed her own *pro se* subsequent writ application in United States district court in Texas pursuant to 28 U.S.C §2254. When her writ application was referred to the Fifth Circuit as a subsequent writ, her mother again hired the undersigned counsel to represent Petitioner in the Fifth Circuit and then in United States district court after the Fifth Circuit found Petitioner had made a prima facie showing of entitlement to relief. After representation of Petitioner in district court, Petitioner's mother became unable to continue to hire counsel for Petitioner on appeal, due to the lack of resources and illness, so the district court appointed the undersigned to represent Petitioner on appeal in the Fifth Circuit pursuant to 18 U. S.C. 3006A by its Order Granting Leave to Appeal *In Forma Pauperis* And Appointing Counsel For Appeal, entered December 22, 2016. Doc 100. As a result of her sentence and incarceration, the Petitioner has not had and does not have assets with which she can

hire counsel to represent her on a petition for writ of *certiorari* in this court. Neither does the Petitioner have the ability to pay the expenses that are necessary to proceed in this court. Attached hereto as Exhibit "A" is the affidavit of the Petitioner in support of this motion.

WHEREFORE, the Petitioner prays that she be granted leave to proceed *in forma pauperis* in this court.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "J. Craig Jett", is written over a horizontal line. The signature is enclosed within a large, hand-drawn oval.

J. Craig Jett
State Bar No. 10660750
900 Jackson Street
Founders Square
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Dallas, Texas 75202
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Attorney for Petitioner
Telisa De'Ann Blackman

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing *Motion for Leave to Proceed In Forma Pauperis* was served upon Assistant Attorney General Susan San Miguel, by email to susan.sanmiguel@texasattorneygeneral.gov and by Federal Express to Office of the Attorney General, William P. Clements State Office Building, 300 W. 15th Street, Austin, Texas 78701, on the date this motion is delivered to a Federal Express, a commercial third party carrier for filing in this Court on December 28, 2018, for delivery within three calendar days.



J. Craig Jett

EXHIBIT "A"

AFFIDAVIT OF TELISA DE'ANN BLACKMAN

STATE OF TEXAS

§

KNOW ALL MEN BY THESE PRESENTS:

§

COUNTY OF CORYELL

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"My name is Telisa De'Ann Blackman and I am an inmate in the Mountain View Unit of the Institutional Division of the Texas Department of Criminal Justice, in Gatesville, Texas. I have been in custody since about September 30, 1998, when I was convicted and sentenced in the 291st District Court of Dallas County, Texas, Cause No. F97-50638-U

"I have no assets. I have no income. I have no funds or other means by which to hire counsel or pay the fees and expenses necessary for any legal proceedings. I have not and cannot pay the fine and court costs that were assessed against me by the State of Texas.

"I swear or affirm under penalty of perjury that, because of my poverty, I cannot pay any attorneys' fees, court costs, fines, expenses of litigation, printing costs or any other costs necessary to proceed in any court regarding my case. I believe that the Supreme Court of the United States should consider and grant my petition for *certiorari*.

"I swear or affirm that I am currently a prisoner in the Institution Division of the Texas Department of Criminal Justice and that all of my statements in this affidavit are true and correct.

SIGNED on Decembr 11th, 2018.

Telisa De'Ann Blackman

Telisa De'Ann Blackman

Barbara Holden

Witness