

18-8062

No. \_\_\_\_\_

In The

**SUPREME COURT OF THE UNITED STATES**

**SAUNDRA TAYLOR**

Petitioner

v.

**D.C. DEPT OF EMPLOYMENT SERVICES**

Respondent *ET AL*

**ORIGINAL**

Supreme Court, U.S.  
FILED

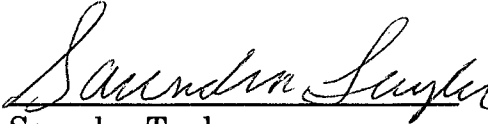
**FEB 21 2019**

OFFICE OF THE CLERK

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

COME NOW Petitioner, Sandra Taylor, Pro Se, pursuant to Supreme Court Rule 39 the petitioner asks for leave to file the attached petition for a writ of certiorari, without prepayment of costs and to proceed in forma pauperis. The petitioner has not previously been granted leave to proceed in forma pauperis in the District of Columbia Court of Appeals. The petitioner's affidavit or declaration in support of this motion is attached hereto.

Respectfully submitted,

  
Sandra Taylor

**AFFIDAVIT OR DECLARATION  
IN SUPPORT OF MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS***

I, SAUNDRA TAYLOR, am the petitioner in the above-entitled case. In support of my motion to proceed *in forma pauperis*, I state that because of my poverty I am unable to pay the costs of this case or to give security therefor; and I believe I am entitled to redress.

1. For both you and your spouse estimate the average amount of money received from each of the following sources during the past 12 months. Adjust any amount that was received weekly, biweekly, quarterly, semiannually, or annually to show the monthly rate. Use gross amounts, that is, amounts before any deductions for taxes or otherwise.

| Income source  | Average monthly amount during the past 12 months |                | Amount expected next month |                |
|--|--|----------------|----------------------------|----------------|
|  | You  | Spouse         | You                        | Spouse         |
| Employment   | \$ <u>0</u>                                      | \$ <u>NONE</u> | \$ <u>0</u>                | \$ <u>NONE</u> |
| Self-employment  | \$ _____   | \$ _____       | \$ _____                   | \$ _____       |
| Income from real property (such as rental income)                    | \$ _____   | \$ _____       | \$ _____                   | \$ _____       |
| Interest and dividends   | \$ _____   | \$ _____       | \$ _____                   | \$ _____       |
| Gifts  | \$ _____   | \$ _____       | \$ _____                   | \$ _____       |
| Alimony  | \$ _____   | \$ _____       | \$ _____                   | \$ _____       |
| Child Support  | \$ _____   | \$ _____       | \$ _____                   | \$ _____       |
| Retirement (such as social security, pensions, annuities, insurance) | \$ <u>0</u>                                      | \$ _____       | \$ <u>0</u>                | \$ <u>NONE</u> |
| Disability (such as social security, insurance payments)             | \$ <u>1501.00</u>                                | \$ <u>NONE</u> | \$ <u>1501.00</u>          | \$ <u>NONE</u> |
| Unemployment payments  | \$ <u>0</u>                                      | \$ <u>NONE</u> | \$ <u>0</u>                | \$ <u>NONE</u> |
| Public-assistance (such as welfare)                                  | \$ _____   | \$ _____       | \$ _____                   | \$ _____       |
| Other (specify): _____   | \$ <u>0</u>                                      | \$ <u>NONE</u> | \$ <u>0</u>                | \$ <u>NONE</u> |
| <b>Total monthly income:</b>   | \$ <u>1501.00</u>                                | \$ <u>NONE</u> | \$ <u>1501.00</u>          | \$ <u>NONE</u> |

2. List your employment history for the past two years, most recent first. (Gross monthly pay is before taxes or other deductions.)

| Employer    | Address | Dates of Employment | Gross monthly pay |
|-------------|---------|---------------------|-------------------|
| <u>NONE</u> |         |                     | \$                |
|             |         |                     | \$                |
|             |         |                     | \$                |

3. List your spouse's employment history for the past two years, most recent employer first. (Gross monthly pay is before taxes or other deductions.)

| Employer  | Address | Dates of Employment | Gross monthly pay |
|-----------|---------|---------------------|-------------------|
| <u>NO</u> |         |                     | \$                |
|           |         |                     | \$                |
|           |         |                     | \$                |

4. How much cash do you and your spouse have? \$ 0  
Below, state any money you or your spouse have in bank accounts or in any other financial institution.

| Type of account (e.g., checking or savings) | Amount you have | Amount your spouse has |
|---|-----------------|------------------------|
| <u>CHECKING</u>                             | \$ <u>0</u>     | \$ <u>NONE</u>         |
|   | \$              | \$                     |
|   | \$              | \$                     |

5. List the assets, and their values, which you own or your spouse owns. Do not list clothing and ordinary household furnishings.

☐ Home  
Value NONE

☐ Other real estate  
Value NONE

☐ Motor Vehicle #1  
Year, make & model \_\_\_\_\_  
Value NONE

☐ Motor Vehicle #2  
Year, make & model \_\_\_\_\_  
Value NONE

☐ Other assets  
Description NONE  
Value \_\_\_\_\_

6. State every person, business, or organization owing you or your spouse money, and the amount owed.

Person owing you or  
your spouse money

Amount owed to you

Amount owed to your spouse

NONE

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

7. State the persons who rely on you or your spouse for support. For minor children, list initials instead of names (e.g. "J.S." instead of "John Smith").

Name

Relationship

Age

Saundra Taylor

myself

57

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

8. Estimate the average monthly expenses of you and your family. Show separately the amounts paid by your spouse. Adjust any payments that are made weekly, biweekly, quarterly, or annually to show the monthly rate.

You

Your spouse

Rent or home-mortgage payment  
(include lot rented for mobile home)

\$ 950.00

\$ NONE

Are real estate taxes included? ☐ Yes ☒ No

Is property insurance included? ☐ Yes ☒ No

Utilities (electricity, heating fuel,  
water, sewer, and telephone)

\$ 58.00

\$ NONE

Home maintenance (repairs and upkeep)

\$ 0

\$ NONE

Food

\$ 200.00

\$ NONE

Clothing

\$ 30.00

\$ NONE

Laundry and dry-cleaning

\$ 15.00

\$ NONE

Medical and dental expenses

\$ NONE

\$ NONE

|  |                   | Your spouse    |
|--|-------------------|----------------|
| Transportation (not including motor vehicle payments)  | \$ <u>0</u>       | \$ <u>NONE</u> |
| Recreation, entertainment, newspapers, magazines, etc.<br><u>CABLE</u>                         | \$ <u>131.00</u>  | \$ _____       |
| Insurance (not deducted from wages or included in mortgage payments)                           |                   |                |
| Homeowner's or renter's  | \$ <u>0</u>       | \$ _____       |
| Life   | \$ _____          | \$ _____       |
| Health   | \$ _____          | \$ _____       |
| Motor Vehicle  | \$ _____          | \$ _____       |
| Other: _____   | \$ <u>0</u>       | \$ _____       |
| Taxes (not deducted from wages or included in mortgage payments)                               |                   |                |
| (specify): _____   | \$ <u>0</u>       | \$ _____       |
| Installment payments   |                   |                |
| Motor Vehicle  | \$ _____          | \$ _____       |
| Credit card(s)   | \$ _____          | \$ _____       |
| Department store(s)  | \$ <u>0</u>       | \$ _____       |
| Other: <u>Past CC Debts</u>  | \$ <u>60.00</u>   | \$ _____       |
| Alimony, maintenance, and support paid to others   | \$ <u>0</u>       | \$ _____       |
| Regular expenses for operation of business, profession,<br>or farm (attach detailed statement) | \$ _____          | \$ _____       |
| Other (specify): _____   | \$ <u>0</u>       | \$ _____       |
| <b>Total monthly expenses:</b>   | \$ <u>1414.00</u> | \$ <u>NONE</u> |

9. Do you expect any major changes to your monthly income or expenses or in your assets or liabilities during the next 12 months?

☐ Yes ☒ No If yes, describe on an attached sheet.

10. Have you paid – or will you be paying – an attorney any money for services in connection with this case, including the completion of this form? ☐ Yes ☒ No

If yes, how much? \_\_\_\_\_

If yes, state the attorney's name, address, and telephone number:

11. Have you paid—or will you be paying—anyone other than an attorney (such as a paralegal or a typist) any money for services in connection with this case, including the completion of this form?

☐ Yes ☒ No

If yes, how much? \_\_\_\_\_

If yes, state the person's name, address, and telephone number:

12. Provide any other information that will help explain why you cannot pay the costs of this case.

DO NOT HAVE the money AND HAVE NO OTHER  
RESOURCE TO GET the money.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: FEBRUARY 14, 2019

Sandra Taylor  
(Signature)