

Capital Case No. \_\_\_\_\_

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IN THE  
**Supreme Court of the United States**

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**JUAN RAMON MEZA SEGUNDO,**  
*Petitioner*

v.

**LORIE DAVIS,**  
*Respondent*

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

JASON D. HAWKINS  
Federal Public Defender  
Northern District of Texas

JEREMY SCHEPERS  
Supervisor, Capital Habeas Unit

Jessica Graf (#305125)  
Derek VerHagen (#308525)  
Assistant Federal Public Defenders  
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Northern District of Texas  
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Dallas, TX 75202  
214-767-2746  
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Jessica\_Graf@fd.org

May 10, 2019

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

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**JUAN RAMON MEZA SEGUNDO,**  
*Petitioner*

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

Petitioner asks for leave to file the attached petition for a writ of certiorari without prepayment of fees and to proceed *in forma pauperis*.

Petitioner is currently incarcerated at the Texas Department of Criminal Justice's Polunsky Unit in Livingston, Texas. He has previously sought and been granted leave to proceed *in forma pauperis* in the following courts:

- the United States Court of Appeals for the Fifth Circuit; and
- the United States District Court for the Northern District of Texas.

Petitioner's affidavit or declaration of indigency is not attached because the court below appointed counsel in the current proceeding, pursuant to 18 U.S.C. § 3599. A copy of the appointment order is appended.

Respectfully submitted,

/s/ Jessica Graf

Jessica Graf (#305125)

Assistant Federal Defender

Capital Habeas Unit

Office of Federal Public Defender

Northern District of Texas

525 S. Griffin St., Ste. 629

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214-767-2746

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Jessica\_Graf@fd.org

*Counsel of record for*

*Petitioner Juan Segundo*

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

JUAN RAMON MEZA SEGUNDO,	§	
<i>Petitioner,</i>	§	
	§	
V.	§	
	§	No. 4:10-CV-970-Y
LORIE DAVIS, Director,	§	
Texas Department of Criminal	§	(Death Penalty Case)
Justice, Correctional	§	
Institutions Division,	§	
<i>Respondent.</i>	§	

**ORDER SUBSTITUTING COUNSEL**

Petitioner Juan Ramon Meza Segundo has filed an opposed motion for the substitution of counsel. (Motion, doc. 79.) Respondent Lorie Davis has filed her response in opposition. (Resp., doc. 80.) Because the substitution appears necessary in light of counsel's change in employment, the motion is granted.

Having reviewed the motion and application, the Court previously found that Petitioner is entitled to proceed *in forma pauperis* and to the appointment of counsel by the provisions of 21 U.S.C. § 848(q)(4)(B) (current version at 18 U.S.C. § 3599(a)(2)). (Order, doc. 3 (citing *McFarland v. Scott*, 512 U.S. 849, 855-58 (1994)); Order, doc. 8.) The Court previously appointed Alexander Calhoun as lead counsel for Segundo, who has accepted employment that precludes his continued representation of Segundo. (Order, doc. 3; Motion at 2.) The Court further finds that **the Capital Habeas Unit of the office of the Federal Public Defender for the Northern District of Texas** is qualified and willing to be appointed as lead counsel

to represent Segundo in accordance with 18 U.S.C. § 3599(c). (Motion at 2-3.)

Petitioner's motion for substitution of counsel (doc. 79) is **GRANTED** and, in accordance with Guide § 440, the Capital Habeas Unit of the office of the Federal Public Defender for the Northern District of Texas is **substituted** for Alexander Calhoun as lead counsel for Segundo. Alexander Calhoun's appointment is **terminated** by this order, and he is relieved of all further duties in Petitioner's cause. A copy of this order shall be provided to appointed counsel at the following address:

LEAD COUNSEL      Capital Habeas Unit  
Federal Public Defender for the Northern  
District of Texas  
525 S. Griffin St., Suite 629  
Dallas, TX 75202  
Phone: (214) 767-2746

**IT IS SO ORDERED.**

SIGNED December 1, 2017.

  
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TERRY R. MEANS  
UNITED STATES DISTRICT JUDGE

TRM/rs