

19-5541

ORIGINAL

No. _____

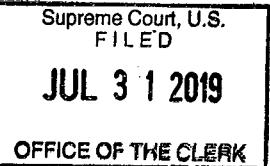
IN THE
Supreme Court of the United States

QUIANNA CANADA,

Petitioner,

v.

TEXAS MUTUAL INSURANCE COMPANY,
STACY PARASTAR GONZALEZ, in her official
capacity; MARSHA THIBODAUX, in her official
capacity; KRISTEN KIRKPATRICK; EDWARD "ED"
COATES; DEMETRIC "DE" LEVIAH; RYAN
JOHNSON; LYNETTE CALDWELL



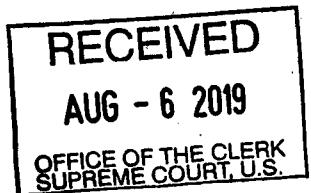
Respondents.

On Petition for a Writ of Certiorari to the United
States Court of Appeals for the Fifth Circuit

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

The Petitioner asks leave to file the attached petition for a writ of certiorari without prepayment of costs and to proceed *in forma pauperis*. The Petitioner has previously been granted leave to proceed *in forma pauperis* in the following court(s):

United States District Court for the Western District of Texas, Austin Division and the United States Court of Appeals for the Fifth Circuit.



The Petitioner's declaration in support of this motion is attached hereto.

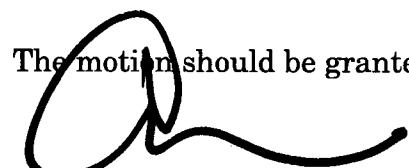
ARGUMENT

The lawsuit against Texas Mutual Insurance Company, *et. al.* has brought the Petitioner negative publicity. Prospective future employers in the U.S. have accessed the opinions and are refusing to interview the Petitioner for positions for which she is qualified. As a result, she remains destitute. Her destitution has been taken into consideration throughout the course of these proceedings. The Petitioner also maintains that she cannot afford to print and mail anymore copies of the petition for writ of certiorari. The requirement that the Petitioner mail any other copy of her petition, given the severity of her personal financial circumstances, can be inferred to constitute fees to the Court, which act as a barrier to participate in the judicial process in this country.

This Court has refused to enforce statutory provisions that would require certain payments of court fees for poor litigants, because these statutes would violate the right to participate in the judicial process. See *Boddie v. Connecticut*, 401 U.S. 371, 374–75, 91 S. Ct. 780, 784–85, 28 L.Ed.2d 113 (1971) (violation of constitutional right of due process). A reduction in the number of copies still prevents the Petitioner from having access to this Court and would violate her First Amendment right. As this Court recognized in *California Motor Transport Co. v. Trucking Unlimited*, 404 U. S. 508, 404 U. S. 510 (1972), the right of access to the courts is an aspect of the First Amendment right to petition the Government for redress of grievances. For the reasons above, the Petitioner should be exempt from mailing additional paper copies of her petition of writ of certiorari to the Court in this case.

CONCLUSION

The motion should be granted.



/s/ Quianna Canada
Quianna Canada

July 30, 2019

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

I, Quionna Canada, 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>0</u>	\$ <u>0</u>	\$ <u>0</u>
Self-employment	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Income from real property (such as rental income)	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Interest and dividends	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Gifts	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Alimony	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Child Support	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Retirement (such as social security, pensions, annuities, insurance)	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Disability (such as social security, insurance payments)	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Unemployment payments	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Public-assistance (such as welfare)	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Other (specify): _____	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Total monthly income:	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</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>Not employed</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>N/A</u>	<u>N/A</u>		\$ <u>N/A</u>
			\$
			\$

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

Financial institution	Type of account	Amount you have	Amount your spouse has
<u>N/A</u>		\$ <u>N/A</u>	\$ <u>N/A</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 N/A

Other real estate
Value N/A

Motor Vehicle #1
Year, make & model N/A
Value _____

Motor Vehicle #2
Year, make & model N/A
Value _____

Other assets
Description _____
Value N/A

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
<u>N/A</u>	\$ <u>0</u>	\$ <u>N/A</u>
	\$ <u>0</u>	\$ <u>N/A</u>
	\$ <u>0</u>	\$ <u></u>

7. State the persons who rely on you or your spouse for support.

Name	Relationship	Age
<u>N/A</u>	<u>No Spouse</u>	<u></u>

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)	\$ <u>0</u>	\$ <u></u>
Are real estate taxes included? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Is property insurance included? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Utilities (electricity, heating fuel, water, sewer, and telephone)	\$ <u>0</u>	\$ <u></u>
Home maintenance (repairs and upkeep)	\$ <u>0</u>	\$ <u></u>
Food	\$ <u>192.00</u>	\$ <u></u>
Clothing	\$ <u>0</u>	\$ <u></u>
Laundry and dry-cleaning	\$ <u>0</u>	\$ <u></u>
Medical and dental expenses	\$ <u>0</u>	\$ <u></u>

	You	Your spouse
Transportation (not including motor vehicle payments)	\$ 0	\$ _____
Recreation, entertainment, newspapers, magazines, etc.	\$ 0	\$ _____
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	\$ 0	\$ _____
Life	\$ 0	\$ _____
Health	\$ 0	\$ _____
Motor Vehicle	\$ 0	\$ _____
Other: <u>N/A</u>	\$ 0	\$ _____
Taxes (not deducted from wages or included in mortgage payments)		
(specify): _____	\$ 0	\$ _____
Installment payments		
Motor Vehicle	\$ 0	\$ _____
Credit card(s)	\$ 0	\$ _____
Department store(s)	\$ 0	\$ _____
Other: <u>N/A</u>	\$ 0	\$ _____
Alimony, maintenance, and support paid to others	\$ 0	\$ _____
Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$ 0	\$ _____
Other (specify): <u>N/A</u>	\$ 0	\$ _____
Total monthly expenses:	\$ 0	\$ _____

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.

Not if the petition is denied.

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? _____

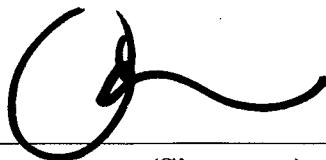
If yes, state the person's name, address, and telephone number:

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

See motion to proceed in forma pauperis.

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

Executed on: July 30, 2019



(Signature)