

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

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

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FATHER,

*Petitioner,*

v.

MATERNAL GRANDPARENTS,

*Respondent.*

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**ON WRIT OF CERTIORARI  
TO THE COURT OF APPEALS OF OHIO, EIGHTH APPELLATE DISTRICT**

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

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The Petitioner requests leave to file the attached petition for writ of certiorari without prepayment of costs and to proceed *in forma pauperis*.

Petitioner has been incarcerated in an Ohio prison since 2006 and lacks the resources with which to pay for the preparation and filing of his petition. This application is supported by the accompanying declaration of his *pro bono* counsel.

Dated: December 7, 2018

Respectfully submitted,



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**ON WRIT OF CERTIORARI**

**TO THE COURT OF APPEALS OF OHIO, EIGHTH APPELLATE DISTRICT**

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**DECLARATION OF ALLISON L. EHLERT IN SUPPORT OF MOTION FOR  
LEAVE TO PROCEED *IN FORMA PAUPERIS***

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I, Allison L. Ehlert, hereby declare as follows:

1. I am an attorney duly admitted to the bar of the State of California, as well as admitted to practice before this Court. I am a principal with Ehlert Hicks LLP and an attorney for Petitioner. I submit this declaration in support of Petitioner's Motion for Leave to Proceed *In Forma Pauperis*. I have personal knowledge of the facts set forth herein, except as to those stated on information and belief and, as to those, I am informed and believe them to be true. If called as a witness, I could and would competently testify to the matters stated herein.

2. I serve as *pro bono* counsel for Petitioner in connection with his Petition for a Writ of Certiorari.

3. Petitioner has been incarcerated in Ohio since 2006. I am informed and believed that he is indigent and therefore lacks the resources to pay for the costs associated with the preparation and filing of his Petition.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct.

Executed on September 9, 2019, at Richmond, California.

A. L. Ehlert  
Allison L. Ehlert