

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

QUINTIN PHILLIPPE JONES
Petitioner,
v.
Lorie Davis, Director,
Texas Department of Criminal Justice,
Correctional Institutions Division, Respondent.

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

MOTION FOR LEAVE TO FILE IN FORMA PAUPERIS

Lydia M.V. Brandt*
lydiabrandt566@gmail.com
The Brandt Law Firm, P.C.
Texas Bar No. 00795262
P.O. Box 326
Farmersville, TX 75442-0326
(972) 752-5805
Member of the Supreme Court Bar
**Counsel of Record* for Petitioner JONES

Michael Mowla
P.O. Box 868
Cedar Hill, TX 75106
Phone: 972-795-2401
Fax: 972-692-6636
Email: michael@mowlalaw.com
Texas Bar # 24048680
Member of the Supreme Court Bar

The Petitioner, QUINTIN PHILLIPPE JONES , asks leave to file in this Court without prepayment of costs and to proceed in forma pauperis. Petitioner had been granted leave by the federal district courts and Texas state courts to proceed in forma pauperis.

On March 21, 2008, the federal district court appointed undersigned counsel, Brandt, pursuant to 21 U.S.C. § 848(q)(4)(B) to represent Mr. Jones. On February 13, 2014, the court appointed Michael Mowla as co-counsel to represent Mr. Jones. Since their appointments, both Brandt and Mowla have represented Mr. Jones in *Jones v. Davis*, in the U.S. District Court, Case No. 4:05-CV-638-Y, and in the Fifth Circuit, Case No. 16-70003. Counsel continue to act in their capacity as CJA counsel in representing Mr. Jones in this proceeding in the U.S. Supreme Court, pursuant to 18 U.S.C. § 3006A, and the Fifth Circuit Plan for Representation; therefore no affidavit is needed in support of this motion.

WHEREFORE, Petitioner Jones respectfully requests that this Court permit him to proceed in this Court, *in forma pauperis*.

Respectfully submitted on October 28, 2019,

/s Lydia M.V. Brandt

Lydia M.V. Brandt*
lydiabrandt566@gmail.com
The Brandt Law Firm, P.C.
Texas Bar No. 00795262
P.O. Box 326
Farmersville, TX 75442-0326
(972) 972-752-5805

Member of the Supreme Court Bar
**Counsel of Record* for Petitioner Jones