

19-8171

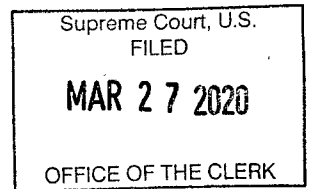
ORIGINAL

March 27, 2020

To: The Clerk, of the United States Supreme Court

From: Petitioner, Carolyn R. Dawson

Subj: Writ for Certiorari and *Forma Pauperis*



Enclosed is my Petition for Writ of Certiorari and Application for *Forma Pauperis*; if not approved please advise, I will try and raise the filing fees because this is a very important matter in which the Supreme Court has recently heard argument on January 13, 2020; in a similar case dealing with "preclusion orders"; in *Lucky Brand Dungarees, Inc., et al, Petitioners v. Marcel Fashion Group, Inc.*; Supreme Court case #18-1086.

Our life's savings, personal belongings and livelihood are at stake because of a wrongful "preclusion order" entered previously preventing us from defending our property and the Fifth Circuit Court of Appeals states they have no jurisdiction over preclusion orders which is not true according to the above case and other circuits.

Sincerely,

  
Carolyn R. Dawson

9590 Minnesota Street, Apt. #3110

Houston, TX 77075

Tel: 346-400-3278

Email: jusu7895@gmail.com

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

I, Carolyn R. Dawson, 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>NA</u>	\$ <u>0</u>	\$ <u>NA</u>
Self-employment	\$ <u>0</u>	\$ <u>NA</u>	\$ <u>0</u>	\$ <u>NA</u>
Income from real property (such as rental income)	\$ <u>0</u>	\$ <u>NA</u>	\$ <u>0</u>	\$ <u>NA</u>
Interest and dividends	\$ <u>0</u>	\$ <u>NA</u>	\$ <u>0</u>	\$ <u>NA</u>
Gifts	\$ <u>0</u>	\$ <u>NA</u>	\$ <u>0</u>	\$ <u>NA</u>
Alimony	\$ <u>0</u>	\$ <u>NA</u>	\$ <u>0</u>	\$ <u>NA</u>
Child Support	\$ <u>0</u>	\$ <u>NA</u>	\$ <u>0</u>	\$ <u>NA</u>
Retirement (such as social security, pensions, annuities, insurance)	\$ <u>2,279.00</u>	\$ <u>NA</u>	\$ <u>2,279.00</u>	\$ <u>NA</u>
Disability (such as social security, insurance payments)	\$ <u>149.00</u>	\$ <u>NA</u>	\$ <u>149.00</u>	\$ <u>NA</u>
Unemployment payments	\$ <u>0</u>	\$ <u>NA</u>	\$ <u>0</u>	\$ <u>NA</u>
Public-assistance (such as welfare)	\$ <u>0</u>	\$ <u>NA</u>	\$ <u>0</u>	\$ <u>NA</u>
Other (specify): _____	\$ <u>0</u>	\$ <u>NA</u>	\$ <u>0</u>	\$ <u>NA</u>
<b>Total monthly income:</b>	\$ <u>2,428.00</u>	\$ <u>NA</u>	\$ <u>2,428.00</u>	\$ <u>NA</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>N/A</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>	\$
	\$	\$
	\$	\$

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 2016, Lexus RX 350  
Value 29,000.00

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

☒ Other assets  
Description None  
Value 0

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>none</u>	\$ _____	\$ _____
_____	\$ _____	\$ _____
_____	\$ _____	\$ _____

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
<u>none</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
<u>Rent</u> or home-mortgage payment (include lot rented for mobile home)	\$ <u>832.00</u>	\$ <u>0</u>
Are real estate taxes included? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Is property insurance included? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
<u>Cost below vary; or not paid</u>		
Utilities (electricity, heating fuel, water, sewer, and telephone)	\$ <u>205.00</u>	\$ <u>0</u>
Home maintenance (repairs and upkeep)	\$ <u>0</u>	\$ <u>0</u>
Food	\$ <u>275.00</u>	\$ <u>0</u>
Clothing	\$ <u>25.00</u>	\$ <u>0</u>
Laundry and dry-cleaning	\$ <u>50.00</u>	\$ <u>0</u>
Medical and dental expenses	\$ <u>50.00</u>	\$ <u>0</u>
Total: \$ <u>1,437.00</u>		

	You	Your spouse
Transportation (not including motor vehicle payments) <i>Quarterly mt.</i>	\$ <u>160.00</u>	\$ <u>NA</u>
Recreation, entertainment, newspapers, magazines, etc.	\$ <u>10.00</u>	\$ <u>NA</u>
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	\$ <u>0</u>	\$ <u>NA</u>
Life	\$ <u>119.00</u>	\$ <u>NA</u>
Health	\$ <u>165.00</u>	\$ <u>NA</u>
Motor Vehicle	\$ <u>0</u>	\$ <u>N/A</u>
Other: <u>Car Ins + GAS</u>	\$ <u>200.00</u>	\$ <u>NA</u>
Taxes (not deducted from wages or included in mortgage payments)		
(specify): _____	\$ <u>0</u>	\$ <u>NA</u>
Installment payments		
Motor Vehicle	\$ <u>559.00</u>	\$ <u>NA</u>
Credit card(s)	\$ <u>59.00</u>	\$ <u>NA</u>
Department store(s)	\$ <u>100.00</u>	\$ <u>NA</u>
Other: <u>Aarons</u>	\$ <u>179.00</u>	\$ <u>NA</u>
Alimony, maintenance, and support paid to others	\$ <u>0</u>	\$ <u>NA</u>
Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$ <u>0</u>	\$ <u>NA</u>
Other (specify): _____	\$ <u>0</u>	\$ <u>NA</u>
<b>Total monthly expenses:</b>	\$ <u>1,551.00</u>	\$ <u>NA</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? \$2,400.00

If yes, state the attorney's name, address, and telephone number: 877-408-3328

The Lane Law Firm  
6200 Savoy Drive, Ste. 1150  
Houston, TX 77036

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

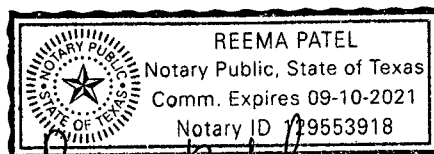
If yes, how much? \_\_\_\_\_

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.  
In a limited income and the process of this case and others have depleted all of my small assets, but is willing to make monthly payments in accordance with Rule 145.

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

Executed on: FEBRUARY 18, 2020



Carolyn R. Dawson  
(Signature)

FEBRUARY 18, 2020

IN THE  
SUPREME COURT OF THE UNITED STATES

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CAROLYN R. DAWSON, PRO SE – PETITIONER

VS.

THE BANK OF NEW YORK, MELLON, ET AL – RESPONDENT

**PROOF OF SERVICE**

I, , do swear or declare that on this date, March 27, 2020; as required by Supreme Court Rule 29, I have served the enclosed MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS and PETITION FOR A WRIT OF CERTIORARI on each party to the above proceeding or that party's counsel, and on every other person required to be served, by depositing an envelope containing the above documents in the United States mail properly addressed to each of them and with first-class postage prepaid, or by delivery to a third-party commercial carrier for delivery within 3 calendar days.

The names and addresses of those served are as follows:

C. Charles Townsend; SBN: 24028053  
fka The Bank of New York,  
as Trustee for the Benefit of  
the CWABS, Inc., Asset-Backed  
Certificates, Series 2006-SD1 and  
New Penn Financial LLC dba  
Shellpoint Mortgage Servicing  
Email: Charles.townsend@akerman.com

Monica Summers; SBN 24083594  
AKERMAN, LLP  
2001 Ross Avenue, Suite 3600  
Dallas, TX 75201  
TEL: 214-720-4300  
FAX: 214-981-9339  
Email: onica.Summers@akerman.com

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

Executed on: March 27, 2020.

  
Carolyn R. Dawson, Pro se  
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Houston, TX 77075  
Tel: (346) 400-3278  
Fax: &13) 391-8357  
jusu7895@gmail.com