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IN THE

SUPREME COURT OF THE UNITED STATES

VERA ZHIRY and PYOTR BONDARUK, Petitioners,

VS.

UNITED STATES OF AMERICA, Respondent.

ON PETITION FOR WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

JOINT MOTION FOR LEAVE TO PROCEED
IN FORMA PAUPERIS

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Attorney for Petitioner
PYOTR BONDARUK

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Attorney for Petitioner
VERA ZHIRY

Counsel of Record

TO THE HONORABLE CHIEF JUSTICE OF THE SUPREME COURT OF THE UNITED STATES AND TO THE HONORABLE ASSOCIATE JUSTICES OF THE COURT:

Pursuant to 18 U.S.C. section 3006A(d)(7) and Rule 39 of the Rules of the Supreme Court of the United States, Petitioners Vera Zhiry and Pyotr Bondaruk (“Petitioners”) respectfully request leave to file their joint petition for writ of certiorari without pre-payment of fees or costs and to proceed *in forma pauperis*. In making this application, Petitioners submit that they were represented by appointed counsel in both the United States District Court for the Eastern District of California and the United States Court of Appeals for the Ninth Circuit. The attached declarations of appellate counsel are provided in support of this application.

Dated: May 28, 2020

Respectfully submitted,

/s/ Alexis Haller
Alexis Haller
Attorney for Petitioner,
VERA ZHIRY
Counsel of Record

/s/ Timothy Warriner
Timothy Warriner
Attorney for Petitioner,
PYOTR BONDARUK

DECLARATION OF ALEXIS HALLER

I am an attorney licensed to practice in California. I am a member of the bar of this Court. I am the attorney of record for Petitioner Vera Zhiry.

I have personal knowledge of the facts contained in this declaration and, if called as a witness, I could and would testify competently thereto.

On October 23, 2015, Petitioner filed a notice of appeal. Subsequently, I was appointed by the United States District Court for the Eastern District of California to represent Petitioner on appeal pursuant to the Criminal Justice Act of 1964. Pursuant to that appointment, I filed pleadings on Petitioner's behalf in the United States Court of Appeals for the Ninth Circuit. I have remained Petitioner's counsel of record to this time.

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

Executed this 28th day of May, 2020, at Aptos, California.

/s/ Alexis Haller
ALEXIS HALLER

DECLARATION OF TIMOTHY WARRINER

I am an attorney licensed to practice in California. I am a member of the bar of this Court. I am the attorney of record for Petitioner Pyotr Bondaruk.

I have personal knowledge of the facts contained in this declaration and, if called as a witness, I could and would testify competently thereto.

On October 26, 2015, I was appointed by the United States District Court for the Eastern District of California to represent Petitioner on appeal pursuant to the Criminal Justice Act of 1964. On October 29, 2015, Petitioner filed a notice of appeal. Pursuant to my appointment, I filed pleadings on Petitioner's behalf in the United States Court of Appeals for the Ninth Circuit. I have remained Petitioner's counsel of record to this time.

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

Executed this 28th day of May, 2020, at Sacramento, California.

/s/ Timothy Warriner
Timothy Warriner