

20-5876
No. _____

ORIGINAL

In The
Supreme Court of the United States

Supreme Court U.S.

SEP 25 2020

OFFICE OF THE CLERK

Paula Idele Keller,
Petitioner,

Vs.

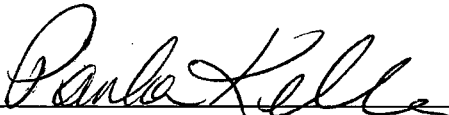
Respondent

Washington Mutual Bank, FA Et Al

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

MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS

The petitioner asks for leave to file the attached petition for a writ of certiorari without payment of costs and to proceed *In Forma Pauperis*. Petitioner has not previously been granted leave to proceed *In Forma Pauperis* in the Ninth Circuit Court of Appeals. Petitioner's declaration in support of this motion is attached hereto.



Paula Idele Keller – Petitioner In Pro Se
C/O JK Consulting Services
12400 Ventura Boulevard, Suite 856
Studio City, California 91604
Telephone No. (310) 613-3767
Telefacsimile No. (310) 775-4045

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

I, Paula Idele Keller, am the petitioner in the above-entitled case. In support of my action to proceed In Forma Pauperis, I state that because of my limited financial resources 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 twelve months. Adjust any amount that was received weekly, bi-weekly, 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	\$ -0-	\$ N/A	\$ -0-	\$ N/A
Self-employment	\$ -0-	\$ N/A	\$ -0-	\$ N/A
Income from real property	\$ 7,700	\$ N/A	\$ 7,700	\$ N/A
Interest and dividends	\$ -0-	\$ N/A	\$ 7,700	\$ N/A
Gifts	\$ -0-	\$ N/A	\$ -0-	\$ N/A
Alimony	\$ -0-	\$ N/A	\$ -0-	\$ N/A
Child support (Foster Care)	\$ 5,000	\$ N/A	\$ 5,000	\$ N/A
Retirement such as social Security, pensions, annuities, insurance	\$ 1,727	\$ N/A	\$ 1727	\$ N/A
Disability (such as social security, insurance payments)	\$ -0-	\$ N/A	\$ -0-	\$ N/A
Unemployment payments	\$ -0-	\$ N/A	\$ -0-	\$ N/A
Public-assistance (such as welfare)	\$ -0-	\$ N/A	\$ -0-	\$ N/A
Other (specify)	\$ -0-	\$ N/A	\$ -0-	\$ N/A
Total monthly income	\$ 14,427	\$ N/A	\$14,427	\$ N/A

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
N/A	N/A	N/A	\$ N/A
_____	_____	_____	_____
_____	_____	_____	_____

3. List your spouse's 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
N/A	N/A	N/A	\$ N/A
_____	_____	_____	_____
_____	_____	_____	_____

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.

Type of account (e.g. checking or savings)	Amount you have	Amount your spouse has
<u>Checking</u>	<u>\$ 2,000</u>	<u>N/A</u>
_____	_____	_____
_____	_____	_____

5. List the assets and their value, which you own or your spouse earns. Do not list clothing and ordinary household furnishings.

Home. \$ N/A	Other real estate. \$ 1,980,000
Motor vehicle 1. \$ 5,000	Motor vehicle 2. \$ 10,000
Other assets. 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
\$ N/A	\$	\$
_____	_____	_____

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
(a)	Christian Lozano	Foster child (disabled)	20 years
(b)	AL	Foster child	15 years
(c)	KW	Foster child	9 years
(d)	KW	Foster child	6 years
(e)	JL	Foster child	6 years
(f)	BH	Foster child	5 months
(g)	Constance Keller	Ex-Mother-In-Law (disabled)	83 years

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, bi-weekly, monthly, quarterly or annually to show the monthly rate.

	You	Your spouse
Rent or home mortgage payment (include lot rental for mobile home) Are real taxes included? Is property insurance included?	\$ 5,054	\$ N/A
Utilities electricity, heating fuel, water, and telephone	\$ 845	\$ N/A
House maintenance (repairs and upkeep)	\$ 400	\$ N/A
Food	\$ 1,000	\$ N/A
Clothing	\$ 350	\$ N/A
Laundry and dry-cleaning	\$ 80	\$ N/A
Medical and dental expenses	\$ 300	\$ N/A
Transportation not including vehicle payments	\$ 800	\$ N/A
Recreation, entertainment, newspapers magazines	\$ 50	\$ N/A
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	\$ 25	\$ N/A
Life	\$ -0-	\$ N/A

Health	\$ 160	\$ N/A
Motor vehicle	\$ 380	\$ N/A
Other _____	\$ -0-	\$ N/A
Taxes (not deducted from wages or included in mortgage payments)		
(specify): _____	\$ 50	\$ N/A
Installment payments		
Motor vehicle	\$ 750	\$ N/A
Credit card(s)	\$ 1,500	\$ N/A
Department store(s)	\$ 100	\$ N/A
Other _____	\$ -0-	\$ N/A
Alimony, maintenance and support paid others	\$ -0-	\$ N/A
Regular expenses for operation of business, profession or farm (attach detailed statement)	\$ -0-	\$ N/A
Other (specify): _____	\$ -0-	\$ N/A
Total monthly expenses	\$ 11,790	\$ N/A

8. Do you expect any major changes to your monthly income or expenses or in your assets or liabilities during the next 12 months?

No

9. Have you paid – or will you be paying – an attorney any money for services in connection with this case, including completion of this form?

No

10. Have you paid – or will you be paying – anyone other than an attorney (such as a paralegal or typist) any money for services in connection with this case, including the completion of this form?

No

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

I am the Foster parent of five children under the age of 18 and one young adult who suffers from a form of autism known as Asperger's – a total of six dependents in addition to caring for an 88 year old woman with MS.

I hereby declare under the penalty of perjury that the foregoing is true and correct to the best of my belief and abilities in this case.

Executed on this the ____ day of September 2020.

Respectfully submitted,

Paula Idele Keller – Petitioner – In Pro Se


Paula Idele Keller

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

NOTARY PUBLIC

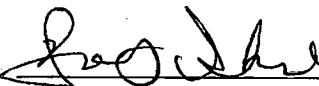
State of California)
)ss
County of Los Angeles)

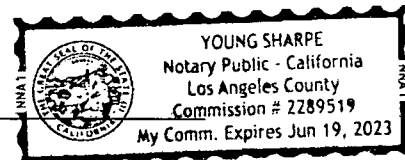
On this 25 day of September 2020, before me, Young Sharpe, a Notary Public, in and for the State of California and County of Los Angeles, personally appeared Paula Idele Keller, who proved to me on the basis of satisfactory evidence to be the person whose name is ascribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity, and that by her signature on the instrument those persons or the entity upon behalf of which the person acted, executed the instrument.

I hereby certify under the Penalty of Perjury under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and Official Seal.

Signature: _____





PROOF OF SERVICE

I, John P. Kissonas, the undersigned, declare:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action: my business address is 12400 Ventura Boulevard, Suite 856, Studio City, California 91604.

On the date set forth below, I caused to be served a true and correct copy of the document(s) described as **MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS** on all interested parties of this action listed below, in the indicated matter:

[XX] BY MAIL: I placed a true copy thereof enclosed in a sealed envelope, addressed and set forth below, and deposited each envelope with postage fully prepaid to be placed for collection and mailing following ordinary business practices of my business. I am familiar with my businesses practice for collection and processing of correspondence for first class mailing within the United States Postal Service, that the correspondence would be deposited with the United States Postal Service that same day in the ordinary course of business, and that the document served was placed for deposit in the United States mail in accordance with the business practice, with postage thereon fully prepaid, at the place listed below:

**WASHINGTON MUTUAL BANK, FA &
JP MORGAN CHASE BANK,
NATIONAL ASSOCIATION, AS
ATTORNEY-IN-FACT FOR FEDERAL
DEPARTMENT OF INSURANCE
NATIONAL ASSOCIATION, AS
CORPORATION, AS RECEIVER OF
WASHINGTON MUTUAL BANK F/K/A
WASHINGTON MUTUAL BANK, FA
7610 West Washington Street, Fl.
Indianapolis, Indiana 46231**

**ALAW &
CALIFORNIA RECONVEYANCE
COMPANY
9200 Oakdale, Avenue, Suite 100
Chatsworth, California 91311**

**BANK OF AMERICA, N.A.
C/O CT SYSTEMS CORP.
818 West Seventh Street, Suite 930
Los Angeles, California 90017**

**GGAT MANAGEMENT
C/O CT SYSTEMS CORP.
SERVICES 2014-12, LLC
C/O THE MANAGEMENT
TRUST COMPANY
Corporation Trust Center
1209 Orange Street
Wilmington, Delaware 19801**

**MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS
1818 Library Street, Suite 300
Reston, Virginia 20190**

PROOF OF SERVICE (Continued)

PITE DUNCAN, LP
C/O ALDRIDGE PITE, LP
4375 Jutland Drive, Suite 200
San Diego, California 92117

SELENE FINANCE, LP
Post Office Box No. 422039
9990 Richman Avenue
Houston, Texas. 77052

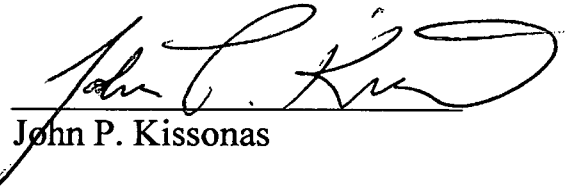
CAM IX TRUST
C/O HMC ASSETS
2015 Manhattan Beach Blvd., Suite 200
Redondo Beach, California 90278

QUALITY LOAN SERVICES
CORPORATION
411 Ivy Street
San Diego, California 92121

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

Executed this 25th day of September 2020

By:


John P. Kissonas