

No. \_\_\_\_-\_\_\_\_

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In The

**Supreme Court of the United States**

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**JOEY LAMOND BRUNSON, a/k/a Flex,  
Petitioner,**

v.

**UNITED STATES OF AMERICA,  
Respondent.**

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**On Petition for a Writ of Certiorari  
to the United States Court of Appeals  
for the Fourth Circuit**

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

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Pursuant to Rules 12.2, 21, and 39 of the Rules of this Court, petitioner Joey Lamond Brunson a/k/a Flex, by counsel, respectfully asks leave to file the accompanying Petition for a Writ of Certiorari without prepayment of costs and to proceed *in forma pauperis*.

Pursuant to the Criminal Justice Act, 18 U.S.C. § 3006A (CJA), on March 7, 2017, the United States District Court for the District of South Carolina appointed a CJA panel attorney as counsel for petitioner. Since that time, while there have been substitutions, petitioner has been represented by an attorney appointed pursuant to the CJA in all of the proceeding before the district court, the Fourth Circuit, and this Court, including those leading up to the Fourth Circuit's decision below.

Respectfully submitted,

*LAW OFFICES OF  
DAVID B. BETTS*

  
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