

CASE NO.

IN THE SUPREME COURT OF THE UNITED STATES
OCTOBER 2020 TERM

ROMELL BROOM,

Petitioner,

vs.

TIM SHOOP, Warden,

Respondent.

On Petition for a Writ of Certiorari
To the United States Court of Appeals for the Sixth Circuit

MOTION TO PROCEED IN FORMA PAUPERIS

(CAPITAL CASE: EXECUTION DATE IS SCHEDULED MARCH 16, 2022)

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PETITIONER'S MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*

Petitioner Romell Broom, through his undersigned CJA appointed counsel, respectfully requests leave to file his Petition for Writ of Certiorari to the United States Court of Appeals for the Sixth Circuit without the pre-payment of costs or fees, and to proceed *in forma pauperis* pursuant to Rule 39 of the Supreme Court Rules.

By orders dated January 15, 1999, the undersigned attorneys were appointed by the United States District Court for the Northern District of Ohio, under the Criminal Justice Act, 18 U.S.C. §3006A, to represent Petitioner in all of his habeas corpus proceedings. Counsels' appointments were continued by order of the United States Court of Appeals Sixth Circuit on June 10, 2019.

For all of these reasons, and in the interest of justice, Petitioner respectfully requests that his motion for leave to proceed *in forma pauperis* be granted.

Respectfully Submitted,

s/ S. Adele Shank
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