

No. 20-6877

ORIGINAL

Supreme Court, U.S. FILED
JAN 06 2021
OFFICE OF THE CLERK

IN THE
SUPREME COURT OF THE UNITED STATES

William M. Windsor — PETITIONER
(Your Name)

VS.
Sean D. Frerling RESPONDENT(S)

MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*

The petitioner asks leave to file the attached petition for a writ of ~~certiorari~~ ^{mandamus} ~~unto~~ without prepayment of costs and to proceed *in forma pauperis*.

Please check the appropriate boxes:

Petitioner has previously been granted leave to proceed *in forma pauperis* in the following court(s):

TEXAS TENTH COURT OF APPEALS
TEXAS SUPREME COURT

Petitioner has **not** previously been granted leave to proceed *in forma pauperis* in any other court.

Petitioner's affidavit or declaration in support of this motion is attached hereto.

Petitioner's affidavit or declaration is **not** attached because the court below appointed counsel in the current proceeding, and:

The appointment was made under the following provision of law: _____, or _____

a copy of the order of appointment is appended.

William M. Windsor

(Signature)

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

I, William Windsoe, 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>0</u>	\$ <u>0</u>	\$ <u>0</u>
Self-employment	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Income from real property (such as rental income)	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Interest and dividends	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Gifts	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Alimony	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Child Support	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Retirement (such as social security, pensions, annuities, insurance)	\$ <u>2228</u>	\$ <u>0</u>	\$ <u>2228</u>	\$ <u>0</u>
Disability (such as social security, insurance payments)	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Unemployment payments	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Public-assistance (such as welfare)	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Other (specify): _____	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Total monthly income:	\$ <u>2228</u>	\$ <u>0</u>	\$ <u>2228</u>	\$ <u>0</u>

* DIVORCED JUNE 12, 2013

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
W/T	W/T	W/T	\$ 0
W/T	W/T	W/T	\$ 0
W/T	W/T	W/T	\$ 0

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
NO Spouse	W/T	W/T	\$ 0
W/T	W/T	W/T	\$ 0
W/T	W/T	W/T	\$ 0

4. How much cash do you and your spouse have? \$ 80.

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
Wells Fargo	\$ 15,333.	\$ 0
—	\$ 0	\$ 0
—	\$ 0	\$ 0

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

Home
Value 60,000

Other real estate
Value 0

Motor Vehicle #1
Year, make & model 2017 JEEP CHEROKEE
Value 1,000.

Motor Vehicle #2
Year, make & model NONE
Value 0

Other assets
Description _____
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>	\$ 0	\$ 0
<u>NONE</u>	\$ 0	\$ 0
<u>NONE</u>	\$ 0	\$ 0

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>	<u>s/t</u>	<u>s/t</u>
<u>NONE</u>	<u>s/t</u>	<u>s/t</u>
<u>NONE</u>	<u>s/t</u>	<u>s/t</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
Rent or home-mortgage payment (include lot rented for mobile home)	\$ 650	\$ 0
Are real estate taxes included? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Is property insurance included? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Utilities (electricity, heating fuel, water, sewer, and telephone)	\$ 300	\$ 0
Home maintenance (repairs and upkeep)	\$ 50	\$ 0
Food	\$ 600	\$ 0
Clothing	\$ 50	\$ 0
Laundry and dry-cleaning	\$ 25	\$ 0
Medical and dental expenses	\$ 350	\$ 0

	You	Your spouse
Transportation (not including motor vehicle payments)	\$ 100	\$ 0
Recreation, entertainment, newspapers, magazines, etc.	\$ 0	\$ 0
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	\$ 0	\$ 0
Life	\$ 0	\$ 0
Health	\$ 0	\$ 0
Motor Vehicle	\$ 100	\$ 0
Other: _____	\$ 0	\$ 0
Taxes (not deducted from wages or included in mortgage payments)		
(specify): _____	\$ 0	\$ 0
Installment payments		
Motor Vehicle	\$ 350	\$ 0
Credit card(s)	\$ 77,424.	\$ 0
Department store(s)	\$ 0	\$ 0
Other: _____	\$ 0	\$ 0
Alimony, maintenance, and support paid to others	\$ 0	\$ 0
Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$ 0	\$ 0
Other (specify): <u>SEE BELOW</u>	\$ 1300.	\$ 0
Total monthly expenses:	\$ 83,527.	\$ 0

INTERNET \$200
 PRESCRIPTIONS \$200
 TOILETRIES, ETC. \$200

LEGAR \$500
 MISC. \$200

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? 0

If yes, state the attorney's name, address, and telephone number:

N/A

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? 0

If yes, state the person's name, address, and telephone number:

N/A

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

I HAVE DEBT OF OVER \$1,500,000 IN CREDIT
CARDS DEBT (18 MONTHS PAST DUE), ACCOUNTS
AND NOTES PAYABLE, COURT JUDGEMENTS
AND MEDICAL BILLS. SEE ATTACHED.

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

Executed on: January 5, 2021

William M. Anderson

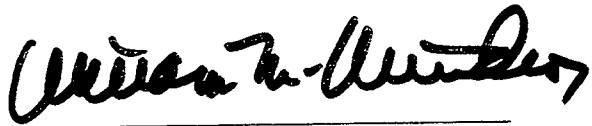
(Signature)

VERIFICATION

Personally appeared before me, the undersigned Notary Public duly authorized to administer oaths, William M. Windsor, who after being duly sworn deposes and states that he is authorized to make this verification and that the facts alleged in the foregoing are true and correct based upon his personal knowledge, except as to the matters herein stated to be alleged on information and belief, and that as to those matters he believes them to be true.

I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge.

This 5th day of January, 2021,



William M. Windsor

Sworn and subscribed before me this 5th day of January, 2021, by means of physical presence.



Jessica Diaz
Notary Public



William M. Windsor - Debts

Company / Person	Address	Address 2	City	St	Zip	Phone	Email	Account #	Note	Owed	Date
Admin Recovery, LLC	6225 Sheridan Drive Suite 118		Williamsville	NY	14221	866-703-7961		6006101016101930	Samsung collection	\$411.95	8/1/2019
Ally Financial	PO Box 380901		Bloomington	MN	55438	888-925-2559		35457	Jeep	\$15,696.22	7/16/2019
American Express	PO Box 981537		El Paso	TX	79998	800-874-2717		3728 178403 32008	credit card	\$0.00	8/11/2019
American Integrity Insurance	MSC #504	PO Box 830469	Birmingham	AL	35283-0469	866-968-8390		AGC0136928	Insurance - canceled	\$892.00	2018
Bank of America	MasterCard	PO Box 982238	El Paso	TX	79998	800-421-2110		5524 3325 1682 4201	credit card	\$43,555.79	9/23/2019
Belk	Synchrony Bank	PO Box 965027	Orlando	FL	32896-5027	855-752-8046		5243 0010 0464 3684	credit card	\$1,308.97	8/10/2019
Central Florida Anesthesia	Law Offices of Charles G. McCarthy	PO Box 1045	Bloomington	IL	61702	309-828-7000		69134	medical	\$46.06	
Central Florida Total Health Care	Dr. Jose Lopez	30 Remington Road - Suite 2	Oakland	FL	34787-9797	407-392-1919		5679908	medical	\$61.33	
Chase Bank	Amazon Prime	PO Box 1423	Charlotte	NC	28201-1423	888-247-4080		4147 4001 5895 6142	credit card	\$3,571.06	9/11/2019
Chase Bank	IHG Rewards Club	PO Box 1423	Charlotte	NC	28201-1423	800-698-0120		5466 0420 2703 6662	credit card	\$11,141.85	9/9/2019
Collection Bureau, Inc.	Primary Health Medical Group	PO Box 1219	Nampa	ID	83653-1219	888-432-2432		00848900	collection agency	\$11.93	
Discover	PO Box 30421		Salt Lake City	UT	84130-0421	800-347-3085		6011 2088 4134 0261	credit card	\$7,151.04	9/6/2019
Diversified Consultants, Inc.	Verizon Wireless	PO Box 551268	Jacksonville	FL	32255-1268	877-848-1045		04885310550001	collection agency	\$299.81	
Dr. Allen Newman	301 Skyline Drive #1		Lady Lake	FL	32159	352-753-9922			medical for traffic accident		
Dr. Jose Lopez	Central Florida Total Health Care	30 Remington Road, Suite 2	Oakland	FL	34787-9797	407-392-1919			medical		
LKUC Urgent Care in Mount Dora	8404 US Hwy 411		Mount Dora	FL		352-385-4405			medical for traffic accident		
Dr. Eduardo Parra Davila	Celebration Center for Surgery	410 Celebration Place, Suite 302	Celebration	FL	34747	407-303-3824			medical for traffic accident		
Radiology Specialists of Florida	PO Box 864552		Orlando	FL	32886-4552	866-481-7571			medical for traffic accident		
Clermont Radiology	871 Oakley Sever Drive		Clermont	FL	34711	352-241-6100	info@clermontradiology.com		medical for traffic accident		
Dr. Sumanth Padmanabh	Arbor Medical Group	3900 Lake Center Dr. Suite A1	Mt. Dora	FL	32757				medical for traffic accident		
CMI	1922 Salk Avenue		Tavares	FL	32778				medical for traffic accident		
Florida Hospital Orlando	601 E Rollins St		Orlando	FL	32803				medical for traffic accident		
CareFirst Imaging	1714 SW 17th St Suite 300		Ocala	FL	34474	833-682-7818			medical for traffic accident		
Dr. Owen Fraser	1805 W Colonial Drive #A		Orlando	FL		407-578-9142			medical for traffic accident		
Dr. Jason Gerboc	1210 Waterman Way		Tavares	FL	32778	352-343-2364			medical for traffic accident		
Hohman Rehab	236 Mohawk Road		Clermont	FL	34715	855-404-6908			medical for traffic accident		
Dr. Dante V. Nuzzo	4700 That Street		Leesburg	FL	34748-9723	352-569-7152		617	medical	\$12.89	
Dr. Johnny Gurgen	922 Rolling Acres Rd #205		Lady Lake	FL	32159	352-633-7930			dermatologist	\$131.20	8/21/2019
Dr. Jonathan Glass	Dartmouth Hitchcock Medical Center	1 Medical Center Drive	Lebanon	NH	03756-1000	603-650-7328			medical	\$0.00	2016
Dr. Lewis J Herzbrun	PO Box 1507		Eustis	FL	32757-1507	352-357-7342		WINW1000	medical	\$56.80	

William M. Windsor - Debts

Company / Person	Address	Address 2	City	St	Zip	Phone	Email	Account #	Note	Owed	Date
Dr. Stephanie McRae		PO Box 1447	Mount Dora	FL	32756	352-357-4588			dentist	\$856.00	
Emergency Phys. Of Central FL, LLP	PO Box 628296		Orlando	FL	32862-8296	888-898-3293		17180816015	medical	\$24.31	
First Federal Credit Control, Inc.	Emergency Phys. Of Central FL, LLP	24700 Chargin Blvd Ste 205	Cleveland	OH	44122-5662	800-486-5500		AIG018	collection agency	\$24.00	
Fleming, Sean D.	27120 Barrington Street		Madison Heights	MI	48071			none	Judgment Texas	\$331,085.13	
Florida Hospital Medical Group	Dr. Jason Gerboc	PO Box 14000	Belfast	ME	04915-4033	866-751-3326		2960318A13122	medical	\$164.59	
Lake Eye Associates	1852 Mayo Drive		Tavares	FL	32778-4320	352-343-4798		131772	medical	\$16.57	9/11/2019
McDougal, Kellie	703 E 11th Street		Kemp	TX	75143				legal	\$25,000.00	
Mid Florida Eye Center	17560 Hwy 411		Mount Dora	FL	32757-6711	352-735-2020			medical	\$93.12	8/29/2019
Montana Supreme Court	215 N. Sanders - Room 323	PO Box 203003	Helena	MT	59620-3003				legal	\$1,000.00	
North American Credit Services, Inc.	PO Box 18221		Chattanooga	TN	37422-7221	800-467-5654		5107600	collection agency	\$164.59	
North American Credit Services, Inc.	PO Box 18221		Chattanooga	TN	37422-7221	800-467-5654		5183770	collection agency	\$254.97	
North American Credit Services, Inc.	PO Box 18221		Chattanooga	TN	37422-7221	800-467-5654		5191710	collection agency	\$272.86	
Paramount Urgent Care, Inc.	805 E CR 466		Lady Lake	FL	32159-4205	352-633-7852		252152	medical	\$18.56	
Primary Health Medical Group			ID	ID				00848900	medical	\$11.93	
Radiology Specialists of Florida	PO Box 846552		Orlando	FL	32886-4552	888-960-7392		2149434-QRSFL	medical	\$18.74	
Receivables Performance Management LLC	Verizon Wireless	PO Box 1548	Lynwood	WA	98046-1548			04885310550001	collection agency	\$299.81	
Sam's Club	PO Box 960097		Orlando	FL	32896-0097	800-964-1917		0500	credit card	\$540.60	9/3/2019
Samsung Financial	PO Box 100114		Columbia	SC	29202-3114	800-434-0050		6006 1010 1610 1930	phone	\$411.95	
TD Retail Card Services	Samsung Financial	PO Box 731	Mahwah	NJ	7430	800-806-8840		6006 1010 1610 1930	collection agency	\$335.95	
Verizon Wireless	PO Box 650051		Dallas	TX	75265	800-852-1922		04885310550001	phone scan	\$299.81	
Wells Fargo VISA	PO Box 77 053		Minneapolis	MN	55480-7753	866-229-6333		2729	credit card	\$5,374.95	8/7/2019
Windsor, Barbara	3951 Basque Circle		Smyrna	GA	30080-6513	404-606-1941	harbaragwindsor@charter.net		ex-wife	\$15,000.00	2018
Windsor, Ryan	555 E Fifth St #2811		Austin	TX	78701	415-717-8978	ryan@alcatazmedia.com		son	\$1,053,557.00	2010
TOTAL										\$1,518,762.45	