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

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*IN THE*  
**SUPREME COURT OF THE UNITED STATES**  
OCTOBER TERM, 2020

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**BILLY S. JEFFRIES, Petitioner**

v.

**KENTUCKY JUSTICE AND PUBLIC SAFETY CABINET**  
**and COMMONWEALTH OF KENTUCKY, Respondents**

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

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The Billy Jeffries, ask leave to file the attached Petition for a Writ of Certiorari to the United States Supreme Court without prepayment of costs and to proceed *in forma pauperis* pursuant to Rule 39. As basis for this motion, Petitioner states that he has been declared indigent and allowed to proceed in forma pauperis since the beginning of this action, from circuit court appointment of counsel to representation before the Kentucky Supreme Court, and that counsel has been appointed to represent him as a result. The orders declaring the Petitioners to be indigent and appointing counsel are attached.

WHEREFORE, for the foregoing reasons, Petitioners respectfully request that they be permitted to proceed in this action *in forma pauperis*.

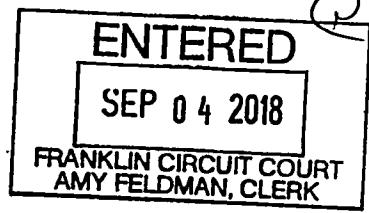
Respectfully Submitted,



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Timothy G. Arnold, Director  
Post-Trial Division  
Department of Public Advocacy  
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Frankfort, KY 40601  
(502) 564-8006  
(502) 687-6769 (fax)  
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COMMONWEALTH OF KENTUCKY  
FRANKLIN CIRCUIT COURT  
48TH JUDICIAL CIRCUIT  
DIVISION II  
CIVIL ACTION NO. 17-CI-1302



BILLY S. JEFFRIES

PLAINTIFF

vs.

THE JUSTICE AND PUBLIC  
SAFETY CABINET, ET AL

DEFENDANTS

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***ORDER GRANTING MOTION TO PROCEED  
IN FORMA PAUPERIS AND APPOINTING COUNSEL***

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The Plaintiff has filed a motion to proceed in this action *in forma pauperis*, and for appointment of counsel on appeal. This court has considered the motion and is otherwise sufficiently advised.

IT IS HEREBY ORDERED that the motion be, and it is hereby, GRANTED. The Plaintiff is permitted to proceed in this action without payment of costs, and the Department of Public Advocacy is hereby appointed to represent the plaintiff.

Given under my hand this on 09-4, 2018.

Signed,  
  
Phillip S. Jeffries  
Judge, Franklin Circuit Court

DISTRIBUTION:

- Hon. Timothy G. Arnold, Department of Public Advocacy, 200 Fair Oaks Lane, Suite 500, Frankfort KY 40601.
- Hon. Graham Gray, Hon. Charles C. Hazelwood II, & Hon. Heather C. Wagers, Kentucky State Police, 919 Versailles Road, Frankfort, KY 40601

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FRANKLIN CIRCUIT COURT  
AMY FELDMAN, CLERK

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FRANKLIN CIRCUIT COURT  
AMY FELDMAN, CLERK

COMMONWEALTH OF KENTUCKY  
FRANKLIN CIRCUIT COURT  
48<sup>TH</sup> JUDICIAL CIRCUIT  
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BILLY S. JEFFRIES

PLAINTIFF

vs.

JUSTICE AND PUBLIC SAFETY CABINET, et. al.

DEFENDANTS

---

**ORDER TO PROCEED *IN FORMA PAUPERIS*,  
AND FOR APPOINTMENT OF COUNSEL**

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The Plaintiff has moved the court for an order to prosecute his complaint and petition for injunctive relief *in forma pauperis*, and it appears that he is a pauper within the meaning of KRS 453.190 and KRS 31.110(2)(c).

IT IS HEREBY ORDERED AND ADJUDGED that the Plaintiff may file his complaint without payment of costs, and the Department of Public Advocacy is appointed to represent him in prosecuting his claim.

Under my hand this 18 day of Dec, 2017

  
\_\_\_\_\_  
Judge, Franklin Circuit Court

Distribution to:

( Hon. Tim Arnold, Department of Public Advocacy, 5 Mill Creek Park, Frankfort, KY 40601; fax: (502) 695-6769;

( Justice and Public Safety Cabinet, Office of General Counsel, 125 Holmes St., Frankfort, KY 40601

( Kentucky Attorney General, 700 Capitol Ave., Suite 118, Frankfort KY 40601

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