

No. 20-7116

IN THE  
SUPREME COURT OF THE UNITED STATES

Isabel del Pino Allen — PETITIONER

**ORIGINAL**

VS.

Board of Trustees of Miami Dade College — RESPONDENT(S)

FILED  
FEB 04 2021

MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*

The petitioner asks leave to file the attached petition for a writ of certiorari 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):

Florida's Eleventh Judicial Circuit Court; Florida's Third District Court of Appeal,  
Florida's Supreme Court

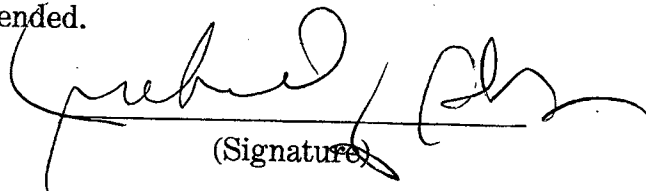
☐ Petitioner has **not** previously been granted leave to proceed *in forma pauperis* in any other court.

X ☒ 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.

  
(Signature)

1/10

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

I, Isabel del Pino Allen, 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	\$ _____	\$ _____	\$ _____	\$ _____
Self-employment	\$ _____	\$ _____	\$ _____	\$ _____
Income from real property (such as rental income)	\$ _____	\$ _____	\$ _____	\$ _____
Interest and dividends	\$ _____	\$ _____	\$ _____	\$ _____
Gifts	\$ _____	\$ _____	\$ _____	\$ _____
Alimony	\$ _____	\$ _____	\$ _____	\$ _____
Child Support	\$ _____	\$ _____	\$ _____	\$ _____
* Retirement (such as social security, pensions, annuities, insurance)	\$ <u>2404.55</u>	\$ <u>748.00</u>	\$ <u>2404.55</u>	\$ <u>748.00</u>
Disability (such as social security, insurance payments)	\$ _____	\$ _____	\$ _____	\$ _____
Unemployment payments	\$ _____	\$ _____	\$ _____	\$ _____
Public-assistance (such as welfare)	\$ _____	\$ _____	\$ _____	\$ _____
Petitioner's **Other (specify): <u>mother S.S</u>	\$ <u>1204.00</u>	\$ _____	\$ <u>***1204.00</u>	\$ _____
<b>Total monthly income:</b>	\$ <u>3608.55</u>	\$ <u>748.00</u>	\$ <u>3608.55</u> ***	\$ <u>748.00</u>

\* This amount (\$2404.55) is the aggregate of Petitioner's Social Security and Florida Retirement pension.

\*\* This amount (\$1204) represents Petitioner's 88 year-old mother's Social Security pension which she releases to Petitioner to help with the monthly household expenses

\*\*\* Considering Petitioner's mother's age (88) the certainty of this contribution is precarious

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
Nova Southeastern University (was adjunct prof)	3301 College Ave Ft. Lauderdale, Fla. 33314	8-2016 to 4-2020	\$ 600.00 \$ paid per \$ course

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
Uber	1455 Market St. San Francisco, Ca.	6-2015 to 3-2020	\$ 400.00 \$ \$

4. How much cash do you and your spouse have? \$  
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
joint checking	\$ 92.17	\$ 92.17
	\$	\$

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

- \* ☐ Home Value \_\_\_\_\_ ☐ Other real estate Value \_\_\_\_\_
- ☒ Motor Vehicle #1 Year, make & model 2006 Mini Cooper S Value \$500 ☐ Motor Vehicle #2 Year, make & model \_\_\_\_\_ Value \_\_\_\_\_
- ☐ Other assets Description \_\_\_\_\_ Value \_\_\_\_\_

\* We were forced to relinquish ownership of our house to a relative due to our indigence, in exchange for \$20,000 for cover expenses until my husband and I were able to collect retirement pensions since I was deprived of my job (and sole source of family income) at age 60: too old to be seriously considered for another professor's job and too young to retire. We still live in our old house and pay the mortgage, property taxes & insurance since the aggregate of these is less than what we would pay if we were renting another place.

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
_____	_____	_____
n/a	_____	_____
_____	_____	_____

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)	\$ 841.77	\$ 841.77
Are real estate taxes included? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Is property insurance included? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Utilities (electricity, heating fuel, water, sewer, and telephone)	\$ 200.00	\$ 200.00
Home maintenance (repairs and upkeep)	\$ _____	\$ _____
Food	\$ 200.00	\$ 200.00
Clothing	\$ _____	\$ _____
Laundry and dry-cleaning	\$ _____	\$ _____
Medical and dental expenses	\$ 50.00	\$ 375.00

	You	Your spouse
Transportation (not including motor vehicle payments)	\$ 30.00	\$ 30.00
Recreation, entertainment, newspapers, magazines, etc.	\$	\$
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's (see entry # 5)	\$ 229.16	\$ 229.16
Life	\$ 56.25	\$ 132.91
Health	\$	\$
Motor Vehicle	\$	\$
Other: _____	\$	\$
Taxes (not deducted from wages or included in mortgage payments)		
(specify): homeowner's (see entry no. 5)	\$ 116.66	\$ 166.66
Installment payments		
Motor Vehicle	\$	\$
*Credit card(s)	\$ 300.00	\$ 300.00
Department store(s)	\$	\$
Other: _____	\$	\$
Alimony, maintenance, and support paid to others	\$	\$
Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$	\$
Other (specify): _____	\$	\$
<b>Total monthly expenses:</b>	<b>\$ 2023.84</b>	<b>\$ 2425.50</b>

\* Because our expenses exceed our income, we are forced to take regular "cash-outs" from credit cards and make monthly minimum payments until the balloon payment is due, when we make another credit card "cash out" to cover the balloon, and so on.

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? \_\_\_\_\_

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

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? \_\_\_\_\_

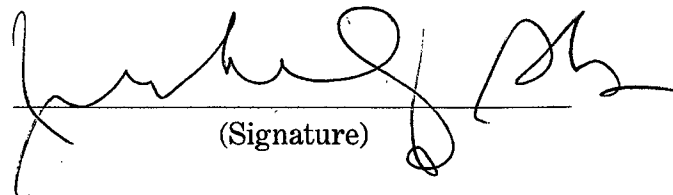
If yes, state the person's name, address, and telephone number:

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

Our monthly expenses exceed our monthly income, even with the generous contribution by my 88 year-old mother. Due to the Covid pandemic and knowing that it would be dangerous for my husband to continue "Ubering" we sold the vehicle that enabled him to do that in order to cover mounting debt. My husband and I, at age 66, are unlikely to find suitable jobs in the future.

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

Executed on: February 4th, 2021

  
(Signature)