

NO. \_\_\_\_\_

***IN THE SUPREME COURT OF  
THE UNITED STATES***

OCTOBER TERM, 2020

HERBERT JONATHAN CASTILLO JUAREZ,	)
	)
And	)
	)
PAOLA VALENZUELA AREVALO,	)
Petitioners,	)
	)
v.	)
	)
UNITED STATES OF AMERICA,	)
Respondent.	)

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

COME NOW the Petitioners, HERBERT JONATHAN CASTILLO JUAREZ and PAOLA VALENZUELA AREVALO, (hereinafter “the Defendants”) pursuant to Supreme Court Rule 39, and move for leave to proceed *in forma pauperis*.

1. The Defendants were determined to be indigent, pursuant to 18 USC § 3006A, by the United States District Court for the Northern District of Georgia. The undersigned CJA counsel were appointed to

represent these clients in the district court and on appeal before the Eleventh Circuit Court of Appeals.

2. The Defendants are husband and wife. They have been in custody since their extradition from Switzerland in August of 2016. The Defendants remain indigent and wish to pursue a writ of certiorari from this Court to the United States Court of Appeals for the Eleventh Circuit, which on April 7, 2021, affirmed their convictions and sentences from the district court.

WHEREFORE, Mr. Castillo Juarez and Ms. Valenzuela Arevalo

ask this Court to grant their joint motion and allow them to proceed *in forma pauperis*.

DATED: This the 6th day of July, 2021.

*s/ L. Burton Finlayson*

---

L. BURTON FINLAYSON  
Georgia Bar No. 261460  
Attorney for Paola Valenzuela Arevalo  
Counsel of record for Petitioner

LAW OFFICE OF L. BURTON FINLAYSON, LLC  
931 Ponce de Leon Ave., N.E.  
Atlanta, GA 30306  
(404) 872-0560  
LBFCOURTS@aol.com

*s/Amanda R. Clark Palmer*

---

AMANDA R. CLARK PALMER  
Georgia Bar No. 130608  
Attorney for Herbert Jonathan Castillo Juarez  
Counsel of record for Petitioner

GARLAND, SAMUEL & LOEB, P.C.  
3151 Maple Drive, N.E.  
Atlanta, Georgia 30305  
(404) 262-2225  
Fax: (404) 365-5041  
aclark@gslaw.com