NO.

### OCTOBER TERM, 2021

#### IN THE SUPREME COURT OF THE UNITED STATES

JOEL DALE WRIGHT,

Petitioner,

v.

STATE OF FLORIDA,

Respondent.

#### MOTION TO PROCEED IN FORMA PAUPERIS

## CAPITAL CASE

Pursuant to Rule 39 of the Rules of this Court, Petitioner JOEL DALE WRIGHT respectfully moves this Court for leave to file his accompanying Petition for Writ of Certiorari to the Supreme Court of Florida without prepayment of fees and costs and to proceed *in forma pauperis*.

Mr. Wright was declared indigent and permitted to proceed *in forma pauperis* by the Circuit Court of the Seventh Judicial Circuit, in and for Putnam County, Florida, on February 29, 1988. *See* Attachment 1. Mr. Wright has proceeded in this status in all subsequent filings challenging his conviction and sentence of death

before the Seventh Judicial Circuit Court, as well as the Florida Supreme Court, the United States District Court for the Middle District of Florida, the United States Court of Appeals for the Eleventh Circuit, and this Court.

WHEREFORE, Petitioner asks this Court to grant his motion and allow him to proceed *in forma pauperis* in this action.

Respectfully submitted,

/s/ Mary Elizabeth Wells Counsel for Mr. Wright

MARY ELIZABETH WELLS Counsel of Record Fla. Bar No. 0866067 Law Office of M.E. Wells LLC 623 Grant Street, SE Atlanta, GA 30312 Tel. (404) 408-2180 mewells 27@comcast.net

August 9, 2021

# ATTACHMENT 1

IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL CIRCUIT, IN AND FOR PUTNAM COUNTY, FLORIDA

Case No. 83-376-CF-M

STATE OF FLORIDA

v.

JOEL DALE WRIGHT

## ORDER

Upon consideration of defendant's motion for order of insolvency:

IT IS HEREBY ORDERED AND ADJUDGED that defendant be declared indigent for the purpose of appeal, and all costs allowed by laws incident to such appeal including, but not limited to, all transcripts necessary to fully prosecute said appeal shall be paid by Pinellas County, Florida.

DONE and ORDERED at Palatka, Florida, this 29th day of

Feb., 1988.

CIRCUIT JUDGE

cc: Stephen L. Boyles, State Attorney
Office of the State Attorney

Larry Helm Spalding, Capital Collateral Representative