

ORIGINAL

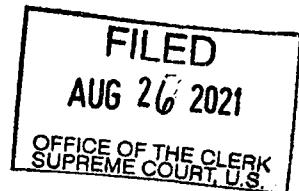
No. _____

21-5643

IN THE

SUPREME COURT OF THE UNITED STATES

Kaon-Jabbar East El PETITIONER
(Your Name)



VS.

United Parcel Service, Inc. RESPONDENT(S)

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):

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.

Kaon-Jabbar East El
(Signature) 08/26/21

1 No. _____

2 IN THE SUPREME COURT OF THE UNITED STATES

3
4 Kaon-Jabbar East El,
Petitioner.

5 vs.

6 United Parcel Services, Inc.,
7 Respondent.

8 MOTION TO FILE "AMENDED" PETITION FOR WRIT OF CERTIORARI

9
10 Petitioner, Kaon-Jabbar East El ("Mr. El"), hereby moves to file the attached Amended Petition For Writ
11 Of Certiorari ("Amended Petition"). *"Amending a petition for certiorari, including amending or adding*
to the questions presented, is permissible where the failure to include arguments or questions in the
original petition is excusable and amendment is in the interests of justice." ~See Shapiro et al.,
12 Supreme Court Practice § 6.27, at 427 (10th ed. 2013)

13 The attached Amended Petition includes corrected typos in the following 5 sections:

14

- 15 • Index Of Appendices: corresponding **missing page numbers**, that were not included in the
original Petition's section/list, are now included.
- 16 • Table Of Authorities Cited: the original Petition is **missing citations** in this section/list, that are
actually present in the original **Statement Of The Case and Reason For Granting The Petition**
sections, and are now included.
- 17 • Jurisdiction: on the original Petition **March 29, 2021 Rehearing DENIED** date was incorrectly
listed in place of the **October 16, 2020 Appeal DISMISSED** date, and now said dates have been
correctly placed.
- 18 • Constitutional And Statutory Provisions Involved: the **definition of 42 U.S.C. § 2(c)(2)** was
included in the original Petition's section/list, yet the **Title, U.S. Code, and Subsection** label was
not included, but are now included.
- 19 • Appellant and Appellee term usage(s): these terms were **accidentally reversed**, and have now
20 been correctly inverted to their proper station.

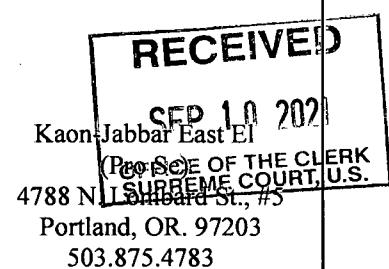
21 The have been no changes to the substance of the arguments nor the background in the original Petition.
22 Additionally, on "page 2" of Petitioner's *MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS*,
23 the average Gross Monthly Pay amount is \$3,000. In the interest of justice, Petitioner files this document
24 'in good faith' to rectify all errors.

25 Respectfully submitted,

26 s/Kaon-Jabbar East El

27 Date: 09/07/2021

28
1 MOTION TO FILE "AMENDED"
PETITION FOR WRIT OF CERTIORARI
09/07/2021



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

I, Kash-Jabbar East E, 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>812.30</u>	\$ <u>0.00</u>	\$ <u>0.00</u>	\$ <u>0.00</u>
Self-employment	\$ <u>0.00</u>	\$ <u>0.00</u>	\$ <u>0.00</u>	\$ <u>0.00</u>
Income from real property (such as rental income)	\$ <u>0.00</u>	\$ <u>0.00</u>	\$ <u>0.00</u>	\$ <u>0.00</u>
Interest and dividends	\$ <u>0.00</u>	\$ <u>0.00</u>	\$ <u>0.00</u>	\$ <u>0.00</u>
Gifts	\$ <u>0.00</u>	\$ <u>0.00</u>	\$ <u>0.00</u>	\$ <u>0.00</u>
Alimony	\$ <u>0.00</u>	\$ <u>0.00</u>	\$ <u>0.00</u>	\$ <u>0.00</u>
Child Support	\$ <u>0.00</u>	\$ <u>0.00</u>	\$ <u>0.00</u>	\$ <u>0.00</u>
Retirement (such as social security, pensions, annuities, insurance)	\$ <u>0.00</u>	\$ <u>0.00</u>	\$ <u>0.00</u>	\$ <u>0.00</u>
Disability (such as social security, insurance payments)	\$ <u>0.00</u>	\$ <u>0.00</u>	\$ <u>0.00</u>	\$ <u>0.00</u>
Unemployment payments	\$ <u>474.00</u>	\$ <u>0.00</u>	\$ <u>0.00</u>	\$ <u>0.00</u>
Public-assistance (such as welfare)	\$ _____	\$ _____	\$ _____	\$ _____
Other (specify): _____	\$ _____	\$ _____	\$ _____	\$ _____
Total monthly income:	\$ <u>1,286.30</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>

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
ESS West	1915 NE Amberlynn Pkwy #260, Hillsboro, OR	March 2016 June 2021	\$ _____ \$ _____ \$ _____

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
N/A	N/A	N/A	\$ _____ \$ _____ \$ _____

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
Checking	\$ 13,667.84	\$ _____
	\$ _____	\$ _____
	\$ _____	\$ _____

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 2015 Dodge Dart
Value \$7,300

Motor Vehicle #2
Year, make & model _____
Value _____

Other assets
Description _____
Value _____

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>N/A</u>	\$ <u>N/A</u>	\$ <u>N/A</u>
	\$ <u>N/A</u>	\$ <u>N/A</u>
	\$ <u>N/A</u>	\$ <u>N/A</u>

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>N/A</u>	<u>N/A</u>	<u>N/A</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)	\$ <u>900.00</u>	\$ <u>N/A</u>
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)	\$ <u> </u>	\$ <u> </u>
Home maintenance (repairs and upkeep)	\$ <u>100.00</u>	\$ <u> </u>
Food	\$ <u>EBT 250.00</u>	\$ <u>N/A</u>
Clothing	\$ <u> </u>	\$ <u> </u>
Laundry and dry-cleaning	\$ <u>100.00</u>	\$ <u> </u>
Medical and dental expenses	\$ <u>100.00</u>	\$ <u> </u>

	You	Your spouse
Transportation (not including motor vehicle payments)	\$ 100.00	\$ N/A
Recreation, entertainment, newspapers, magazines, etc.	\$ 100.00	\$ _____
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	\$ _____	\$ _____
Life	\$ _____	\$ _____
Health	\$ _____	\$ _____
Motor Vehicle	\$ 140.00	\$ _____
Other: _____	\$ _____	\$ _____
Taxes (not deducted from wages or included in mortgage payments)		
(specify): N/A	\$ _____	\$ _____
Installment payments		
Motor Vehicle	\$ _____	\$ _____
Credit card(s)	\$ _____	\$ _____
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): cell phone	\$ 40.00	\$ _____
Total monthly expenses:	\$ 380.00	\$ _____

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:

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? _____

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 am unemployed and pending Rental Assistance.

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

Executed on: August 26, 2021

Fran-Jabbar Est El
(Signature)