

No. _____

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

MARY ELLEN SAMUELS,

Petitioner,

v.

JANEL ESPINOZA, Warden,

Respondent.

On Petition for a Writ of Certiorari
to the United States Court of Appeals for the Ninth Circuit

**MOTION TO PROCEED IN FORMA PAUPERIS;
DECLARATION OF COUNSEL**

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Counsel for Petitioner

DECLARATION OF GWEN FREEMAN

Gwen Freeman hereby declares and says as follows:

1. I am a member of the United States Supreme Court. My co-counsel, Joel Levine, Esq., Joel Levine, a professional corporation, is also a Member of the Bar of the United States Supreme Court. This Motion and Declaration are submitted pursuant to Rule 39 of this Court, in connection with a contemporaneously filed Petition for Writ of Certiorari on behalf of Petitioner Mary Ellen Samuels, following the affirmance of the denial of her Petition for Writ of Habeas Corpus by the United States District Court and the United States Court of Appeals for the Ninth Circuit, the later of which occurred on December 6, 2021.

2. Petitioner was declared indigent before the United States District Court for the Central District of California, and was afforded appointed counsel. Petitioner remains so indigent, and was represented by appointed counsel (the undersigned and Mr. Levine) before the United States Court of Appeals for the Ninth Circuit. Petitioner remains indigent at the time this Petition is being submitted.

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

Dated: February 17, 2022



Gwen Freeman