

No. \_\_\_\_\_

In The

Supreme Court of the United States

---

TYRIK UPCHURCH,  
*Petitioner*

v.

UNITED STATES OF AMERICA,  
*Respondent.*

---

On Petition for Writ of Certiorari to the  
United States Court of Appeal for the Third Circuit

---

Motion For Leave to Proceed *In Forma Pauperis*

---

Petitioner, Tyrik Upchurch, pursuant to the Supreme Court of the United States Rule 39 and 18 U.S.C. § 3006A(d)(6), asks for leave to file the accompanying Petition for Writ of Certiorari to the United States Court of Appeals for the Third Circuit without prepayment of costs and to proceed *in forma pauperis*. On appeal to the United States Court of Appeals for the Third Circuit, Petitioner was represented by counsel appointed under the Criminal Justice Act, 18 U.S.C. § 3006A(b) and (c). Consistent with the Supreme Court of the United States Rule 39, no affidavit is required to be filed in support of this motion.

Respectfully Submitted,

Date: July 5, 2022

/s/ Coley O. Reynolds  
Coley O. Reynolds, Esquire  
PA I.D. # 86923  
121 S. Broad Street, Suite 1200  
Philadelphia, PA 19107  
267-710-1177 Fax: 267-710-1176  
cor@reynoldsfirm.com

Counsel for petitioner,  
Tyrik Upchurch