#### IN THE

# Supreme Court of the United States

Gabriel Paul Hall, Petitioner, v. State of Texas, Respondent.

On Petition for Writ of Certiorari to the Court of Criminal Appeals of Texas

### APPLICATION FOR LEAVE TO PROCEED IN FORMA PAUPERIS

ROBERT C. OWEN

Counsel of Record

LAW OFFICE OF ROBERT C. OWEN, LLC

P.O. Box 607425

Chicago, Illinois 60660-7381

(512) 577-8329

robowenlaw@gmail.com

MCKENZIE EDWARDS CLEVELAND KRIST LLP 303 Camp Craft Rd., Ste 325 (737) 900-9844 West Lake Hills, TX 78746 medwards@clevelandkrist.com RAOUL D. SCHONEMANN
THEA J. POSEL
UNIVERSITY OF TEXAS SCHOOL OF LAW
727 East Dean Keeton Street
Austin, Texas 78722
(512) 232-9391
rschonemann@law.utexas.edu
tposel@law.utexas.edu

Counsel for Petitioner

Petitioner GABRIEL PAUL HALL, by counsel, respectfully asks leave to file the accompanying Petition for Writ of Certiorari to the Court of Criminal Appeals of Texas without prepayment of costs and to proceed *in forma pauperis*. Petitioner is indigent and proceeded *in forma pauperis* both in the trial court and on appeal. The order appointing counsel for appeal is attached as Exhibit 1. See Sup. Ct. R. 39.

Respectfully submitted,

<u>/s Robert C. Owen</u>
Robert C. Owen
Counsel of Record
Member, Supreme Court Bar

Law Office of Robert C. Owen, LLC P.O. Box 607425 Chicago, Illinois 60660-7381 (512) 577-8329 robowenlaw@gmail.com

Raoul D. Schonemann
Thea J. Posel
Capital Punishment Clinic
University of Texas School of Law
727 East Dean Keeton Street
Austin, Texas 78705
(512) 232-9391
rschonemann@law.utexas.edu
tposel@law.utexas.edu

McKenzie Edwards Cleveland Krist PLLC 303 Camp Craft Rd., Ste 325 West Lake Hills, TX 78746 (737) 900-9844 medwards@clevelandkrist.com

Counsel for Petitioner Gabriel Paul Hall

# **EXHIBIT 1**

Order appointing counsel (Oct. 22, 2015)

#### No. 11-06185-CRF-272

THE STATE OF TEXAS

272ND DISTRICT COURT

VS.

IN

GABRIEL PAUL HALL

BRAZOS COUNTY, TEXAS

### ORDER APPOINTING ATTORNEY

On this October 22, 2015, let it be known that the Court found good cause to release the court appointed attorney from this case.

It is therefore, ORDERED, ADJUDGED AND DECREED, that REGIONAL PUBLIC **DEFENDER FOR CAPITAL CASES, LUBBOCK, TEXAS**, is hereby released in this case and no longer represents GABRIEL PAUL HALL, Defendant in the above numbered cause.

On this October 22, 2015, let it be known that this Court found good cause to appoint counsel to represent the Defendant in any post-conviction appeal proceedings in the above numbered cause.

I hereby appoint ROBERT C. OWEN, PRO BONO, an attorney found by the Court to be competent, to represent GABRIEL PAUL HALL, Defendant in the above numbered and titled cause, in any post-conviction appeal proceedings, if any, or until released by written order of this Court.

I hereby appoint RAOUL SCHONEMANN, PRO BONO, an attorney found by the Court to be competent, to represent GABRIEL PAUL HALL, Defendant in the above numbered and titled cause, in any post-conviction appeal proceedings, if any, or until released by written order of this Court.

The appointment of ROBERT C. OWEN AND RAOUL SCHONEMANN, is conditioned upon of them being approved as qualified appellate counsel in death penalty cases by the Second Administrative Judicial Region of Texas.

SIGNED on Thursday, October 22, 2015.

	•	Anice	3. Mygr
•		TRAVIS B. BRYAN III	
		Presiding Judge	//
Copy was:	☐ Mailed to:	☐ Delivered to: ☐ Tran	smitted by fax to:
ROBERT C	. OWEN	Bluhm Legal Clinic	Phone: (312) 503-0135
		Northwestern University School of Law	Fax: (312) 503-8977
		375 East Chicago Avenue	
		Chicago, Illionis 60611	
Attorney Appointed		Address	Phone/Fax Number
RAOUL SCHONEMANN		University of Texas School of Law	Phone: (512) 232-9391
IMOUL SC.		727 East Dean Keeton Street	Fax: (512) 471-3489
		Austin, Texas 78705	
Attorney Appointed		Address	Phone/Fax Number
Copy was:	☐ Mailed to:	☐ Delivered to: Custod	y status:
GABRIEL PAUL HALL		TDCJ ALLAN B. POLUNSKY	UNIT
TDCJ# 00999599		3872 FM 350 SOUTH	,
		LIVINGSTON, TEXAS 77351	
Defendant		Address	·

Copy was faxed to Office of the Brazos County District Attorney ATTN: JARVIS PARSONS; BRIAN BAKER; DOUG HOWELL VIA FAX NO. (979) 361-4368

COURTESY COPY FAXED TO:

REGIONAL PUBLIC DEFENDER FOR CAPITAL CASES, LUBBOCK, TEXAS

ATTN: JACK STOFFREGEN VIA FAX NO. 806-775-7954 (Attorney removed per this Order)