

No. _____

IN THE
Supreme Court of the United States

CAITLYN WILLIAMS,
Petitioner,
v.

STATE OF MISSOURI,
Respondent.

TAMARAE LARUE,
Petitioner,
v.

STATE OF MISSOURI,
Respondent.

**On Petition for a Writ of Certiorari
To the Supreme Court of Missouri**

MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*

Ellen H. Flottman,
Counsel of Record
Office of the Missouri State
Public Defender
Woodrail Centre
1000 W. Nifong
Building 7, Suite 100
Columbia, Mo 65203
(573) 777-9977
ellen.flottman@mspd.mo.gov

COMES NOW, Ellen H. Flottman, attorney for petitioners, Caitlyn Williams and Tamarae LaRue, and pursuant to Rule 39, requests leave to file their Petition for Writ of Certiorari without prepayment of costs and to proceed in *forma pauperis*.

1. Petitioner Williams is presently housed in the Missouri Department of Corrections at the Chillicothe Correctional Center. Petitioner Williams has been represented throughout her case at trial and on appeal by the Missouri State Public Defender because she cannot afford an attorney. Petitioner Williams has insufficient assets to pay the costs of this case. Her affidavit statement in support of this motion is attached.

2. Petitioner LaRue has been represented throughout her case at trial and on appeal by the Missouri State Public Defender because she cannot afford an attorney. Petitioner LaRue has insufficient assets to pay the costs of this case. Her affidavit statement in support of this motion is attached.

3. Petitioner Williams has been granted leave to proceed as a poor person throughout her case in the Circuit Court of Laclede County, Missouri in 2022 and on appeal in the Missouri Supreme Court in 2022.

4. Petitioner LaRue has been granted leave to proceed as a poor person throughout her case in the Circuit Court of Laclede County, Missouri in 2022 and on appeal in the Missouri Supreme Court in 2022.

WHEREFORE, Petitioners Caitlyn Williams and Tamarae Larue pray this Court grant them leave to proceed in *forma pauperis* in this Court.

Respectfully submitted,



Ellen H. Flottman

Petitioners' Counsel of Record
Office of the Missouri State Public
Defender
Woodrail Centre
1000 W. Nifong
Building 7, Suite 100
Columbia, Mo. 65203
(573) 777-9977
Ellen.Flottman@mspd.mo.gov