

No. _____

IN THE

Supreme Court of the United States

BRANDON DE MC CALL,

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*

DOUGLAS H. PARKS

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Counsel for Petitioner

CAPITAL CASE

Petitioner BRANDON DE McCALL, 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. 39.1.

Respectfully submitted,

/s / Douglas H. Parks
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Counsel for Petitioner Brandon De McCall

EXHIBIT 1

Order Appointing Counsel on Appeal (March 2, 2020)

NO. 296-81183-2018

Lynne Finley

District Clerk

Collin County, Texas

By: Joseph, Christina

Deputy

THE STATE OF TEXAS

IN THE 296th JUDICIAL

V.

DISTRICT COURT OF

BRANDON DE MCCALL

COLLIN COUNTY, TEXAS

ORDER APPOINTING COUNSEL ON APPEAL

The Defendant was convicted of capital murder after a jury trial. The Court sentenced the Defendant to death in accordance with the Jury's answers to the special issues submitted on February 27, 2020. The Court finds that the Defendant is indigent. The Defendant has requested that Douglas H. Parks, who served as third-chair trial counsel, be appointed to represent him on appeal. Mr. Parks has also requested that he be appointed to represent the Defendant on appeal. According to Article 26.052(j)-(k) of the Texas Code of Criminal Procedure, the Court finds that good cause exists and appoints **Douglas H. Parks** to represent the Defendant for the purposes of his automatic appeal of his conviction and sentence to the Court of Criminal Appeals.

Signed: March 2, 2020



John R. Roach, Jr.
Presiding Judge