

No. 23M58

IN THE  
SUPREME COURT OF THE UNITED STATES

Paul Wright — PETITIONER  
(Your Name)

VS.

Denis McDonough,  
Secretary of Veterans Affairs — RESPONDENT(S)

MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*

The petitioner asks leave to file the attached petition for a writ of certiorari without prepayment of costs and to proceed *in forma pauperis*.

Please check the appropriate boxes:

Petitioner has previously been granted leave to proceed *in forma pauperis* in the following court(s):

Court of Appeals for Veterans Claims

Court of Appeals for the Federal Circuit

Petitioner has **not** previously been granted leave to proceed *in forma pauperis* in any other court.

Petitioner's affidavit or declaration in support of this motion is attached hereto.

Petitioner's affidavit or declaration is **not** attached because the court below appointed counsel in the current proceeding, and:

The appointment was made under the following provision of law: \_\_\_\_\_, or

a copy of the order of appointment is appended.

Paul Wright  
(Signature)

**AFFIDAVIT OR DECLARATION  
IN SUPPORT OF MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS***

I, Paul Wright, am the petitioner in the above-entitled case. In support of my motion to proceed *in forma pauperis*, I state that because of my poverty I am unable to pay the costs of this case or to give security therefor; and I believe I am entitled to redress.

1. For both you and your spouse estimate the average amount of money received from each of the following sources during the past 12 months. Adjust any amount that was received weekly, biweekly, quarterly, semiannually, or annually to show the monthly rate. Use gross amounts, that is, amounts before any deductions for taxes or otherwise.

Income source	Average monthly amount during the past 12 months		Amount expected next month	
	You	Spouse <sup>NA</sup>	You	Spouse <sup>NA</sup>
Employment	\$ 1,187	\$ _____	\$ 940	\$ _____
Self-employment	\$ _____	\$ _____	\$ _____	\$ _____
Income from real property (such as rental income)	\$ _____	\$ _____	\$ _____	\$ _____
Interest and dividends	\$ _____	\$ _____	\$ _____	\$ _____
Gifts	\$ _____	\$ _____	\$ _____	\$ _____
Alimony	\$ _____	\$ _____	\$ _____	\$ _____
Child Support	\$ _____	\$ _____	\$ _____	\$ _____
Retirement (such as <u>social security</u> , pensions, annuities, insurance)	\$ 1,965	\$ _____	\$ 3,083	\$ _____
Disability (such as social security, insurance payments)	\$ 572	\$ _____	\$ 586	\$ _____
Unemployment payments	\$ _____	\$ _____	\$ _____	\$ _____
Public-assistance (such as welfare)	\$ _____	\$ _____	\$ _____	\$ _____
Other (specify): _____	\$ _____	\$ _____	\$ _____	\$ _____
<b>Total monthly income:</b>	\$ 3,724	\$ _____	\$ 3,609	\$ _____

2. List your employment history for the past two years, most recent first. (Gross monthly pay is before taxes or other deductions.)

Employer	Address	Dates of Employment	Gross monthly pay
CompassSouth	Walterboro SC	6/22 - present	\$ varies by work load
			\$
			\$

3. List your spouse's employment history for the past two years, most recent employer first. (Gross monthly pay is before taxes or other deductions.) NA - estranged and separated

Employer	Address	Dates of Employment	Gross monthly pay
State of Oregon			\$ unknown - NA
			\$
			\$

4. How much cash do you <sup>no</sup> and your spouse have? \$ 105  
 Below, state any money you or your spouse have in bank accounts or in any other financial institution.

Type of account (e.g., checking or savings)	Amount you have	Amount your spouse has
checking	\$ 65	\$ NA
	\$	\$
	\$	\$

5. List the assets, and their values, which you own or your spouse owns. Do not list clothing and ordinary household furnishings.

Home  
 Value \_\_\_\_\_

Other real estate  
 Value \_\_\_\_\_

Motor Vehicle #1  
 Year, make & model 2010 Subaru Forester  
 Value ~\$500 inoperable engine

Motor Vehicle #2  
 Year, make & model 2013 Subaru Forester  
 Value ~\$2500 wrecked but driveable

Other assets  
 Description personal effects  
 Value ~\$10,000

6. State every person, business, or organization owing you or your spouse money, and the amount owed.

Person owing you or your spouse money	Amount owed to you	Amount owed to your spouse
<u>Secretary of VA</u>	\$ <u>to be determined</u>	\$ _____
_____	\$ _____	\$ _____
_____	\$ _____	\$ _____

7. State the persons who rely on you or your spouse for support. For minor children, list initials instead of names (e.g. "J.S." instead of "John Smith").

Name	Relationship	Age
<u>Jill G. Wright</u>	<u>Estranged spouse, separated living in Oregon</u>	<u>65</u>
_____	_____	_____
_____	_____	_____

8. Estimate the average monthly expenses of you and your family. Show separately the amounts paid by your spouse. Adjust any payments that are made weekly, biweekly, quarterly, or annually to show the monthly rate.

	You	Your spouse
Rent or home-mortgage payment (include lot rented for mobile home) Are real estate taxes included? <input type="checkbox"/> Yes <input type="checkbox"/> No Is property insurance included? <input type="checkbox"/> Yes <input type="checkbox"/> No	\$ <u>950</u>	\$ _____
Utilities (electricity, heating fuel, water, sewer, and telephone)	\$ <u>200</u>	\$ _____
Home maintenance (repairs and upkeep)	\$ <u>50</u>	\$ _____
Food	\$ <u>300</u>	\$ _____
Clothing	\$ <u>50</u>	\$ _____
Laundry and dry-cleaning	\$ _____	\$ _____
Medical and dental expenses	\$ <u>100</u>	\$ _____

	You	Your spouse <sup>NA</sup>
Transportation (not including motor vehicle payments)	\$ 200	\$ _____
Recreation, entertainment, newspapers, magazines, etc.	\$ 200	\$ _____
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	\$ 25	\$ _____
Life	\$ _____	\$ _____
Health	\$ 147	\$ _____
Motor Vehicle	\$ 70	\$ _____
Other: _____	\$ _____	\$ _____
Taxes (not deducted from wages or included in mortgage payments)		
(specify): <u>125 quarterly estimate</u>	\$ 100	\$ _____
Installment payments		
Motor Vehicle	\$ 260	\$ _____
Credit card(s)	\$ _____	\$ _____
Department store(s)	\$ _____	\$ _____
Other: _____	\$ _____	\$ _____
Alimony, maintenance, and support paid to others <i>not settlement, to ex spouse</i>	\$ 1,000	\$ _____
Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$ _____	\$ _____
Other (specify): _____	\$ _____	\$ _____
<b>Total monthly expenses:</b>	<b>\$ 3,752</b>	\$ _____

9. Do you expect any major changes to your monthly income or expenses or in your assets or liabilities during the next 12 months?

Yes     No    If yes, describe on an attached sheet.

I expect the Secretary of Veterans Affairs to pay the disability compensation that is being unlawfully withheld as I have proven in my pleadings the courts below have refused to hear.

10. Have you paid – or will you be paying – an attorney any money for services in connection with this case, including the completion of this form?     Yes     No

If yes, how much? \_\_\_\_\_

If yes, state the attorney's name, address, and telephone number:

11. Have you paid—or will you be paying—anyone other than an attorney (such as a paralegal or a typist) any money for services in connection with this case, including the completion of this form?

Yes     No

If yes, how much? \_\_\_\_\_

If yes, state the person's name, address, and telephone number:

12. Provide any other information that will help explain why you cannot pay the costs of this case.  
I live month-to-month on limited income. I have earned a license as an apprentice appraiser of commercial real estate; I work as I am able, but disabilities substantially limit my earning capacity. To pay filing fees and printing costs in this case, I would have to take away from my only "discretionary" spending categories, Food and Recreation, at risk to my health.

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

Executed on: March 26, 2024

Paul Wijstra  
(Signature)

No. 24-\_\_\_\_

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

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PAUL WRIGHT,

*Petitioner,*

v.

DENIS McDONOUGH, SECRETARY OF  
VETERANS AFFAIRS,

*Respondent.*

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**PROOF OF SERVICE**

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I, Paul Wright, do declare that on this date, March 27, 2024, as required by Supreme Court Rule 29.5(c) I have serve the enclosed MOTION TO PROCEED IN FORMA PAUPERIS on both parties required to be served, by depositing an envelope containing the above documents in the United States Mail properly addressed to each of them and with first class postage prepaid. The names and addresses of those served are as follows:

Solicitor General of the United States  
Room 5616, Department of Justice  
950 Pennsylvania Ave., N. W.  
Washington, DC 20530-0001

Jana Moses, Esq., for Secretary of Veterans Affairs  
U.S. Department of Justice Civil Division  
Commercial Litigation Branch - Washington, DC  
1100 L Street, N.W., 9th Floor  
Washington, DC 20530

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

Executed on March 27, 2024

  
Paul Wright

