

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

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IN THE  
SUPREME COURT OF THE UNITED STATES

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GABRIEL PAUL HALL,  
*Petitioner,*

v.

TEXAS,  
*Respondent.*

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On Petition for a Writ of Certiorari to the  
272nd District Court of Brazos County, Texas

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**MOTION FOR LEAVE TO  
PROCEED *IN FORMA PAUPERIS***

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Petitioner Gabriel Paul Hall respectfully asks leave to file the accompanying Petition for Writ of Certiorari to the 272nd District Court of Brazos County, Texas without prepayment of costs and to proceed *in forma pauperis*. Petitioner is indigent and proceeded *in forma pauperis* both in the state habeas trial court as well as the Texas Court of Criminal Appeals. The order appointing counsel for the state habeas proceeding is attached as Exhibit 1.

DATE: April 9, 2024

Respectfully submitted,

/s/ David R. Dow

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David R. Dow\*  
Texas Bar No. 06064900  
Jeffrey R. Newberry  
Texas Bar No. 24060966  
University of Houston Law Center  
4170 Martin Luther King Blvd.  
Houston, Texas 77204-6060  
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*Counsel for Gabriel Paul Hall*

\*Member of the Supreme Court Bar

# Exhibit 1

THE STATE OF TEXAS

272ND DISTRICT COURT

VS.

IN

GABRIEL PAUL HALL

BRAZOS COUNTY, TEXAS

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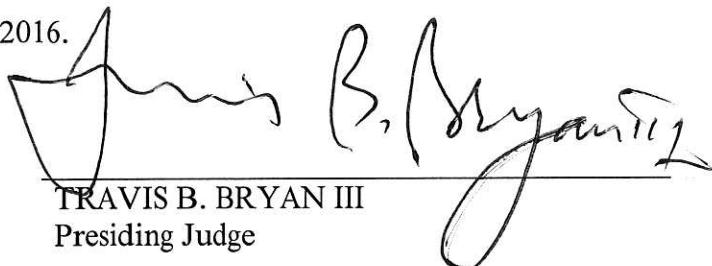
**ORDER APPOINTING ATTORNEY**

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On this January 27, 2016, let it be known that this Court found good cause to appoint an attorney to represent the Defendant in any post-conviction writ proceedings in the above numbered cause(s).

I hereby appoint **DAVID DOW**, 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 writ and/or appeal proceedings, if any, or until released by written order of this Court.

SIGNED on Wednesday, January 27, 2016.



TRAVIS B. BRYAN III  
Presiding Judge

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|--|--|---|
| <b>DAVID DOW</b><br>Cullen Professor, University of Houston Law Center<br>Rorschach Visiting Professor of History, Rice University | 4604 CALHOUN ROAD<br>HOUSTON, TX 77204 | 713-743-2171<br>FAX: 713-743-2120<br>713 743 2131 (correct) |
|--|--|---|

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Attorney Appointed

Address

Phone Number

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GABRIEL PAUL HALL  
TDCJ # 00999599

TDCJ ALLAN B. POLUNSKY UNIT  
3872 FM 350 SOUTH  
LIVINGSTON, TEXAS 77351

---

Defendant Address Phone Number

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

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**ROBERT C. OWEN** Bluhm Legal Clinic Phone: (312) 503-0135  
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---

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**RAOUL SCHONEMANN** University of Texas School of Law Phone: (512) 232-9391  
727 East Dean Keeton Street Fax: (512) 471-3489  
Austin, Texas 78705

---

Attorney Appointed Address Phone/Fax Number



## Office of Capital Writs



Brad D. Levenson  
Director

### FAX COVER SHEET

To: The Honorable Judge Bryan III  
272<sup>nd</sup> District Court

Fax number: 979-361-4517

From: Benjamin Wolff

Fax number: (512) 463-8590      Direct Line: (512) 463-8600

Date: October 8, 2015

Regarding: State v. Gabriel Hall

Total number of pages including cover sheet: 3

Comments:

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