

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

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In the  
**Supreme Court of the United States**  
OCTOBER TERM, 2023

PHILIP SHANE YOUNG,  
*Petitioner,*

v.

THE STATE OF TEXAS  
*Respondent.*

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

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**AMY R. BLALOCK**  
Attorney-At-Law  
P.O. Box 765  
Tyler, TX 75710  
Texas Bar Card No. 02438900  
*Attorney for Petitioner*

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

Pursuant to Rule 39 of the Supreme Court Rules and Title 18, United States Code, Section 3006(d)(6), Petitioner asks leave to file the attached Petition for Writ of Certiorari to the United States Supreme Court without prepayment of costs and to proceed *in forma pauperis*.

Petitioner was represented by the undersigned counsel, appointed by the 7<sup>th</sup> District Court of Texas after a finding of indigence, on appeal to the Twelfth Court of Appeals and the Court of Criminal Appeals of Texas.

Respectfully submitted,

/s/ Amy R. Blalock  
**AMY R. BLALOCK**  
Attorney-At-Law  
P.O. Box 765  
Tyler, TX 75710  
Texas Bar Card No. 02438900  
*Attorney for Petitioner*

## CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of April, 2024, I served one (1) copy of the foregoing Motion For Leave To Proceed In Forma Pauperis on the following individuals by mail by depositing same, enclosed in post paid, properly addressed wrapper, in a Post Office or official depository, under the care and custody of the United States Postal Service, or by other recognized means pursuant to the Rules of the Supreme Court of The United States of America, Rule 29:

Michael West  
Smith County District Attorney's Office  
100 N. Broadway  
Suite 400,  
Tyler, TX 75702

Philip Shane Young  
TDCJ # 02417955  
Coffield Unit  
2661 FM 2054  
Tennessee Colony, TX 75884

/s/ Amy R. Blalock  
**AMY R. BLALOCK**  
*Attorney for Petitioner*

CAUSE NO. 007-0950-21

THE STATE OF TEXAS

VS.

PHILIP SHANE YOUNG

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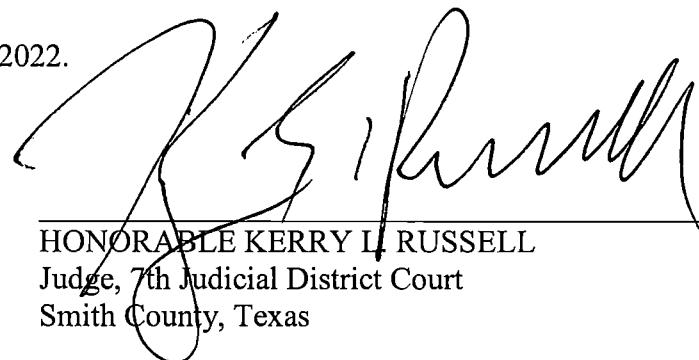
FILED  
PENNY CLARKSTON  
DISTRICT CLERK  
2022 OCT 10 PM 10:07  
IN THE 7TH JUDICIAL DISTRICT COURT OF TEXAS  
SMITH COUNTY, TEXAS  
SMITH COUNTY, TEXAS

**ORDER APPOINTING COUNSEL ON APPEAL**

On this date, the Court finds that court-appointed counsel should be appointed to represent the Defendant PHILIP SHANE YOUNG in his/her appeal from the conviction of *EVADING ARREST DET W/VEH* and the Defendant having sworn that he/she is too poor to employ counsel to represent him/her and the Court being of the opinion that the Defendant is unable to employ counsel; therefore,

IT IS ORDERED that AMY BLALOCK, a practicing attorney in and for the State of Texas, is hereby appointed to represent the Defendant in the appeal of this case.

SIGNED AND ENTERED 10/10/2022.

  
HONORABLE KERRY L. RUSSELL  
Judge, 7th Judicial District Court  
Smith County, Texas

cc: State  
Philip Shane Young

Amy Blalock  
Attorney at Law  
P O Box 765  
Tyler, TX 75711  
(903) 262-7520  
amyblalock@outlook.com