

No.

IN THE
SUPREME COURT OF THE UNITED STATES

E.R.,
PETITIONER,
V.

THE PEOPLE OF THE STATE OF COLORADO
IN THE INTEREST OF:
S.M. AND E.M.,
RESPONDENT.

ON PETITION FOR A WRIT OF CERTIORARI TO THE
COLORADO COURT OF APPEALS

MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS

Katayoun A. Donnelly
Azizpour Donnelly LLC
2373 Central Park Blvd.,
Suite 100
Denver CO, 80238
(720) 675-8584
katy@kdonnellylaw.com

*Counsel for Petitioner, through the Office of Respondent
Parent Counsel*

April 17, 2024

The Petitioner, E.R. (Father), through his counsel, Katayoun A. Donnelly, respectfully requests that this Honorable Court grant leave to proceed *in forma pauperis* in petitioning for a Writ of Certiorari. In support of this request, Petitioner states that undersigned counsel was appointed by the Office of Respondent Parent Counsel ("ORPC"), pursuant to Colorado Revised Statute Section 13-92-104(1)(a)(I) and Chief Justice Directive 16-02, Paras. II (Authority and Responsibilities of the ORPC) and IV(a) (Appointments on Appeal by ORPC), and that Petitioner is unable to retain counsel and pay for costs attendant to the proceedings before this Honorable Court.

WHEREFORE, the Petitioner, E.R., respectfully requests that he be granted leave to proceed *in forma pauperis*.

Respectfully submitted,

/s/ Katayoun Azizpour Donnelly
Azizpour Donnelly LLC
2373 Central Park Blvd.,
Suite 100
Denver, CO 80238
(720) 675-8584
katy@kdonnellylaw.com

Counsel for Petitioner