

No. _____

IN THE
Supreme Court of the United States

WILLIAM HILL,
Petitioner

v.

STATE OF NEW JERSEY,
Respondent

MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*

Petitioner William Hill, by court-appointed counsel, John P. Flynn, asks to file the attached brief in support of his petition for a writ of certiorari without prepayment of costs and to proceed *in forma pauperis*.

Undersigned counsel is a member of the New Jersey Office of the Public Defender's Appellate Section and represents Petitioner on his direct appeal. Petitioner was determined to be indigent, and the New Jersey Office of the Public Defender was appointed to represent him, pursuant to N.J. Stat. Ann. § 2A:158A-14. Undersigned counsel knows of no change in circumstances which would affect the determination of Petitioner's indigency.

For the above-stated reasons and pursuant to Rule 39 of the Supreme Court Rules, Petitioner requests that he be granted leave to proceed *in forma pauperis*.

Dated: May 28, 2024

/s/ John P. Flynn

John P. Flynn
Counsel of Record for Petitioner
New Jersey Assistant Deputy Public Defender
Office of the NJ Public Defender
31 Clinton St, 9th Floor
P.O. Box 46003
Newark, New Jersey 07101
(973) 877-1200
(973) 877-1239 (fax)
John.Flynn@opd.nj.gov