

NO. 24-581

IN THE
SUPREME COURT OF THE UNITED STATES
OCTOBER TERM, 2024

STATE OF UTAH, *Petitioner*,

v.

DOUGLAS A. LOVELL, *Respondent*.

On Petition for Writ of Certiorari to the
to the Supreme Court of Utah

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

The Respondent, Douglas A. Lovell, by and through his counsel, Edwin S. Wall, *pro bono publico*, (with the assistance of state court appointed counsel, Colleen K. Coeberg, *pro hac vice, pending admission*) respectfully requests this Honorable Court for leave to proceed *in forma pauperis* in responding to the *Petition for Writ of Certiorari* filed by the State of Utah.

In support of this motion is the *Affidavit of Colleen K. Coebergh in Support of Indigence of Douglas A. Lovell*. See, Exhibit A. Ms. Coebergh is the court appointed counsel for Mr. Lovell in the matters before the Courts of the State of Utah. See, Exhibit B (Findings and Order Appointing Defense Counsel).

WHEREFORE, the Respondent, Douglas A. Lovell, respectfully requests that he be granted leave to proceed *in forma pauperis*.

Respectfully submitted January 14, 2025.

/s/ Edwin S. Wall
Edwin S. Wall
Pro Bono Publico
43 East 400 South
Salt Lake City, Utah 84111
(801) 746-0900
Edwin@edwinwall.com

Counsel for the Respondent