

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

LILI TYDINGCO,
Petitioner,

vs.

UNITED STATES OF AMERICA,
Respondent.

On Petition for a Writ of Certiorari to
the United States Court of Appeals for the Ninth Circuit

MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*

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Pursuant to Supreme Court Rule 39.1, Petitioner asks leave to file the attached Petition for a Writ of Certiorari without prepayment of costs and to proceed *in forma pauperis*. Petitioner was determined to be indigent and thus was originally represented by court-appointed counsel, pursuant to the Criminal Justice Act of 1964, 18 U.S.C. § 3600A(d)(6) (“CJA”), at her first trial in the District Court for the Northern Mariana Islands (the “District Court”), Crim. Case No. 15-cr-00018. Thereafter, upon Petitioner’s first appeal to the Ninth Circuit Court of Appeals, the original CJA representation automatically continued pursuant to the Ninth Circuit’s Circuit Rule 4-1(a)(2) (“Counsel’s appointment continues on appeal unless and until counsel is relieved by this court”). Petitioner has been continuously represented by original counsel appointed under the CJA throughout the subsequent District Court trials as well as the subsequent Ninth Circuit appeals, and continues to be represented by counsel appointed pursuant to the CJA through to and including the filing of this Petition for a Writ of Certiorari. No affidavit or declaration is attached to this Motion because the undersigned counsel has been duly appointed to represent the Petitioner in federal proceedings under the CJA since the district court appointed him in the first criminal matter.

Respectfully submitted this 28th day of October, 2024.

/s/ Bruce Berline

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