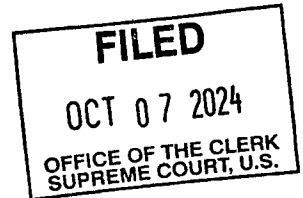


ORIGINAL

No. 24-6113

IN THE
SUPREME COURT OF THE UNITED STATES



LAURA LYNN HAMMETT — PETITIONER
(Your Name)

VS.

PORTFOLIO RECOVERY ASSOCIATES, LLC; DOES 1-99 — RESPONDENT(S)

MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*

The petitioner asks leave to file the attached petition for a writ of certiorari without prepayment of costs and to proceed *in forma pauperis*.

Please check the appropriate boxes:

☐ Petitioner has previously been granted leave to proceed *in forma pauperis* in the following court(s):

☒ Petitioner has **not** previously been granted leave to proceed *in forma pauperis* in any other court.

☒ Petitioner's affidavit or declaration in support of this motion is attached hereto.

☐ Petitioner's affidavit or declaration is **not** attached because the court below appointed counsel in the current proceeding, and:

☐ The appointment was made under the following provision of law: _____, or

☐ a copy of the order of appointment is appended.

Laura Hammett
(Signature)

**AFFIDAVIT OR DECLARATION
IN SUPPORT OF MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS***

I, Laura Lynn Hammett, am the petitioner in the above-entitled case. In support of my motion to proceed *in forma pauperis*, I state that because of my poverty I am unable to pay the costs of this case or to give security therefor; and I believe I am entitled to redress.

1. For both you and your spouse estimate the average amount of money received from each of the following sources during the past 12 months. Adjust any amount that was received weekly, biweekly, quarterly, semiannually, or annually to show the monthly rate. Use gross amounts, that is, amounts before any deductions for taxes or otherwise.

Income source	Average monthly amount during the past 12 months		Amount expected next month	
	You	Spouse	You	Spouse
Employment	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Self-employment	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Income from real property (such as rental income)	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Interest and dividends	\$ <u>0</u>	\$ <u>4</u>	\$ <u>0</u>	\$ <u>4</u>
Gifts	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Alimony	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Child Support	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Retirement (such as social security, pensions, annuities, insurance)	\$ <u>644</u>	\$ <u>0</u>	\$ <u>644</u>	\$ <u>0</u>
Disability (such as social security, insurance payments)	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Unemployment payments	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Public-assistance (such as welfare)	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Other (specify): <u>None</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Total monthly income:	\$ <u>644</u>	\$ <u>4</u>	\$ <u>644</u>	\$ <u>4</u>

2. List your employment history for the past two years, most recent first. (Gross monthly pay is before taxes or other deductions.)

Employer	Address	Dates of Employment	Gross monthly pay
none			\$
			\$
			\$

3. List your spouse's employment history for the past two years, most recent employer first. (Gross monthly pay is before taxes or other deductions.)

Employer	Address	Dates of Employment	Gross monthly pay
Self	16 Gold Lake Club Conway, AR 72032	10/3/2022 to Present	\$ 0
			\$
			\$

4. How much cash do you and your spouse have? \$ 300
Below, state any money you or your spouse have in bank accounts or in any other financial institution.

Type of account (e.g., checking or savings)	Amount you have	Amount your spouse has
Checking	\$ 200	\$ 7,500
Savings	\$ 0	\$ 9,700
	\$	\$

5. List the assets, and their values, which you own or your spouse owns. Do not list clothing and ordinary household furnishings.

☒ Home Value \$250,000 ☐ Other real estate Value 0

☒ Motor Vehicle #1 Year, make & model 2016 Toyota Rav-4 Value \$5,350 ☒ Motor Vehicle #2 Year, make & model 2012 Ford F-250 Value \$5,000

☒ Other assets Description Vehicles for fishing and construction Value \$88,000

6. State every person, business, or organization owing you or your spouse money, and the amount owed.

Person owing you or your spouse money	Amount owed to you	Amount owed to your spouse
Nathaniel Rowe	\$ 6,550	\$ 0
see attachment	\$	\$
	\$	\$

7. State the persons who rely on you or your spouse for support. For minor children, list initials instead of names (e.g. "J.S." instead of "John Smith").

Name	Relationship	Age
See attachment		

8. Estimate the average monthly expenses of you and your family. Show separately the amounts paid by your spouse. Adjust any payments that are made weekly, biweekly, quarterly, or annually to show the monthly rate.

	You	Your spouse
Rent or home-mortgage payment (include lot rented for mobile home)	\$ 0	\$ 0
Are real estate taxes included? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Is property insurance included? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Utilities (electricity, heating fuel, water, sewer, and telephone)	\$ 300	\$ 300
Home maintenance (repairs and upkeep)	\$ 0	\$ 150
Deferred \$46,000		
Food	\$ 450	\$ 600
Clothing	\$ 35	\$ 100
Laundry and dry-cleaning	\$ 8	\$ 16
Medical and dental expenses	\$ 105	\$ 5,000 to \$20,000 see attachment

	You	Your spouse
Transportation (not including motor vehicle payments)	\$ <u>140</u>	\$ <u>60</u>
Recreation, entertainment, newspapers, magazines, etc.	\$ <u>200</u>	\$ <u>100</u>
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	\$ <u>0</u>	\$ <u>200</u>
Life	\$ <u>0</u>	\$ <u>0</u>
Health	\$ <u>0</u>	\$ <u>0</u>
Motor Vehicle	\$ <u>102</u>	\$ <u>366</u>
Other: _____	\$ <u>0</u>	\$ <u>0</u>
Taxes (not deducted from wages or included in mortgage payments)		
(specify): <u>Personal Property + Real Estate</u>	\$ <u>50</u>	\$ <u>167</u>
Installment payments		
Motor Vehicle	\$ <u>0</u>	\$ <u>0</u>
Credit card(s) <u>This is first month</u>	\$ <u>30</u>	\$ <u>0</u>
Department store(s)	\$ <u>0</u>	\$ <u>0</u>
Other: <u>\$100,000 Judgement on appeal</u>	\$ <u>0</u>	\$ <u>0</u>
Alimony, maintenance, and support paid to others	\$ <u>0</u>	\$ <u>0</u>
Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$ <u>0</u>	\$ <u>5933</u>
Other (specify): <u>None</u>	\$ <u>0</u>	\$ <u>0</u>
Total monthly expenses:	\$ <u>1,420</u>	\$ <u>12,992</u> to \$27,992

9. Do you expect any major changes to your monthly income or expenses or in your assets or liabilities during the next 12 months?

☒ Yes ☐ No If yes, describe on an attached sheet.

10. Have you paid – or will you be paying – an attorney any money for services in connection with this case, including the completion of this form? ☐ Yes ☒ No

If yes, how much? Ø

If yes, state the attorney's name, address, and telephone number:

11. Have you paid—or will you be paying—anyone other than an attorney (such as a paralegal or a typist) any money for services in connection with this case, including the completion of this form?

☒ Yes ☐ No

If yes, how much? _____

If yes, state the person's name, address, and telephone number:

See attachment

12. Provide any other information that will help explain why you cannot pay the costs of this case.

See attachment

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: September 20, 2024

Laura Mannett
(Signature)

Laura Lynn Hammett

Question 12

This response clarifies the preceding questions, so I will start with it.

I already spent five times the amount of the disputed debt PRA was trying to collect from me on this case. My savings is gone. This month, I cannot pay my credit cards off in full, as is my custom. The interest I incur from purchasing \$700 worth of supplies to print my petition and motions is directly caused by PRA's insistence to collect on an unsubstantiated, disputed debt until litigation was filed.

Booklet printing by Cockle is estimated at \$30,000 if I include the documents I included here. I do not have the resources available to me. I have \$20,000 of credit available to me to supplement my \$650 pension. Then PRA will win by default.

Two weeks ago, my husband received a stage IV cancer diagnosis.

My husband and I have kept our finances separate and file taxes separately. We do not have bypass trusts. I made a tax-free, irrevocable gift to him, memorialized with the county recorder in 2022, as promised as a wedding gift in 2019. I waited to be dismissed with prejudice from a lawsuit filed by a previous romantic partner, to foreclose on allegations of fraudulent transfer. The IRS considers this gift irrevocable, as was a similar gift made to my adult children around 2013.

My husband is in the working class and unlikely to accumulate enough for a comfortable retirement, especially since he needs to change from physically challenging construction to a desk job. He is in excruciating pain, except when drugged. He is exploring alternative treatment that is not covered by insurance.

I have been diagnosed with Hashimoto's Disease, anemia, low testosterone, low estrogen and progesterone, as well as PTSD. My therapist suggested the self-administered "AQ" test, which indicates that I am on the autism spectrum. While this provides me with certain strengths, autism is also considered a disability. I am using this self-awareness to advance my career in legal journalism, but most writers don't get paid enough to survive. I think I can parlay my skills into a decent income but need further education. I have applied to the University of Arkansas and there is a full tuition scholarship available to me based on my age.

In January 2024, my adult son suffered a two-story fall, resulting in a traumatic brain injury. My son wanted to be at home when he died. As his advocate in the hospital and his accommodator for aphasia and hearing loss, I was an integral part of his miraculous recovery after he left the ICU against medical advice. The time I devoted to his care was invaluable to both of us, but it delayed my occupational training that will help me reenter the workforce.

Laura Lynn Hammett

Question 6

I am the plaintiff in several lawsuits, pro se in each, and a counterclaimant in the suit my former romantic partner filed twice against me and my living trust. In 2022, I was dismissed with prejudice, but my common defense doctrine trust lost by default and \$200,000 worth of assets that I had individual rights to were transferred to Mr. Pietrczak. This is despite the judge seeing a handwritten, signed letter by Mr. Pietrczak describing his intended fraud on the court in regard to our agreement.

The Pietrczak suit and a suit against my sisters and their attorneys have been fully briefed on appeal for about two years and one year respectively.

The suits are discussed in my petition for writ of certiorari. While one issue in this case is that the appellate court affirmed the lower court's grant of summary judgment without de novo review, the effect of the appellate courts failing to make any ruling is the same. Justice delayed is justice denied.

Until the orders on appeal are reversed, my opposing parties control the assets that I should control. It is difficult to know how much is involved because I have been denied discovery and trials.

There is also a six-figure judgment against me for attorney fees on appeal. The lower court refused to stay the judgment on \$80,000+ pending the appeal, unless I post a bond that I cannot afford.

Laura Lynn Hammett

Question 7

My 8-year-old granddaughter does not rely on me directly for financial support, but I am her primary caretaker for approximately 16 hours per week, when both her parents are working.

Laura Lynn Hammett

Question 8

Homeopathic and alternative treatments for my husband that insurance will not cover will cost between \$5,000 to \$20,000 per month.

There is a post-judgment order in another case, also on appeal, denying a stay of a \$80,000+ judgment while waiting for the Ninth Circuit's opinion. I don't know how much to add as a monthly installment for that erroneously authorized debt.

Laura Lynn Hammett

Question 9

My husband's medical expenses, which were about \$8 per month until this month, are expected to spike considerably in our attempt to prolong his life while maintaining a reasonable quality of life as well.

My husband does not have enough information and has not had the opportunity to make definitive plans yet.

Laura Lynn Hammett

Question 11

Sean Lynn

418 Sierra Madre Drive

North Little Rock, AR 72118

\$1,797 from 2021 to 2024

Administrative and consultation

Robert Paisola – Western Capital

Internet consultation based in Las Vegas, Nevada

\$200

Branden Lynn

6500 W. Charleston Blvd, Apartment 324

Las Vegas, Nevada 89146

Transcription of phone calls, consultation

\$599

Stefanie Hughes

4266 Boone Loop Rd

Conway, AR 72034

\$800 From July to August 2021