

No. 24-6734

FILED
DEC 30 2024
OFFICE OF THE CLERK
SUPREME COURT, U.S.

IN THE
SUPREME COURT OF THE UNITED STATES

Christina Taylor-Loper — PETITIONER
(Your Name)

VS.
Sam's Club/Walmart Assoc. Inc. — 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):

United States District Court Eastern District
of North Carolina Western Division.

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: Title VII

_____, or

a copy of the order of appointment is appended.



(Signature)

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

I, Christina Taylor-Loper, 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>300</u>	\$ <u>n/a</u>	\$ <u>200</u>	\$ <u>n/a</u>
Self-employment	\$ _____	\$ _____	\$ _____	\$ _____
Income from real property (such as rental income)	\$ _____	\$ _____	\$ _____	\$ _____
Interest and dividends	\$ _____	\$ _____	\$ _____	\$ _____
Gifts	\$ <u>900</u>	\$ _____	\$ <u>900</u>	\$ _____
Alimony	\$ _____	\$ _____	\$ _____	\$ _____
Child Support	\$ _____	\$ _____	\$ _____	\$ _____
Retirement (such as social security, pensions, annuities, insurance)	\$ _____	\$ _____	\$ _____	\$ _____
Disability (such as social security, insurance payments)	\$ _____	\$ _____	\$ _____	\$ _____
Unemployment payments	\$ _____	\$ _____	\$ _____	\$ _____
Public-assistance <u>SNAP</u> (such as welfare)	\$ <u>730</u>	\$ _____	\$ <u>730</u>	\$ _____
Other (specify): _____	\$ _____	\$ _____	\$ _____	\$ _____
Total monthly income:	<u>\$ 1930.00</u>	\$ _____	<u>\$ 1930.00</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
Flanna Contracting		07/24 - Current	\$ 200.00
Nol Pro Services	32 Elmshy Circle	10/22 - Current	\$ 300.00
Courtyard Marriott	3401 Summer Blvd	08/23 - 11/23	\$ 1000.00

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
n/a			\$
			\$
			\$

4. How much cash do you and your spouse have? \$ 50.00

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
savings	\$ 5.00	\$
Cash App	\$ 100.00	\$
	\$	\$

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

Home
Value n/a

Other real estate
Value n/a

Motor Vehicle #1
Year, make & model n/a
Value _____

Motor Vehicle #2
Year, make & model n/a
Value _____

Other assets
Description n/a
Value _____

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
<u>n/a</u>	\$ <u>n/a</u>	\$ <u>n/a</u>
	\$ <u> </u>	\$ <u> </u>
	\$ <u> </u>	\$ <u> </u>

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
<u>C.L.</u>	<u>Daughter</u>	<u>13</u>
<u>C.B.</u>	<u>Son</u>	<u>4</u>

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)	\$ <u>200.00</u>	\$ <u>n/a</u>
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)	\$ <u>130.00</u>	\$ <u> </u>
Home maintenance (repairs and upkeep)	\$ <u> </u>	\$ <u> </u>
Food	\$ <u>100.00</u>	\$ <u> </u>
Clothing	\$ <u>100.00</u>	\$ <u> </u>
Laundry and dry-cleaning	\$ <u> </u>	\$ <u> </u>
Medical and dental expenses	\$ <u> </u>	\$ <u> </u>

	You	Your spouse
Transportation (not including motor vehicle payments)	\$ 100.00	\$ n/a
Recreation, entertainment, newspapers, magazines, etc.	\$ _____	\$ _____
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	\$ _____	\$ _____
Life	\$ _____	\$ _____
Health	\$ _____	\$ _____
Motor Vehicle	\$ 120.00	\$ _____
Other: _____	\$ _____	\$ _____
Taxes (not deducted from wages or included in mortgage payments)		
(specify): _____	\$ _____	\$ _____
Installment payments		
Motor Vehicle	\$ _____	\$ _____
Credit card(s)	\$ _____	\$ _____
Department store(s)	\$ _____	\$ _____
Other: _____	\$ _____	\$ _____
Alimony, maintenance, and support paid to others	\$ _____	\$ _____
Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$ _____	\$ _____
Other (specify): _____	\$ _____	\$ _____
Total monthly expenses:	\$ 750.00	\$ _____

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? _____

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? 1200⁰⁰

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

Roxanne Rosenberg (therapist) 919-358-6917

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

- My Car was totaled October 23, 2024.
- Due to trauma in connection with this case, I haven't been financially stable. (I haven't had a full time job since Sam's Club.)

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

Executed on: February 17th, 2025



(Signature)

"constitutes a significant change in employment status, such as hiring, firing, failing to promote, reassignment with significantly different responsibilities, or a decision causing a significant change in benefits."

Here, Plaintiff appears to have sufficiently alleged the requisite elements for a Title VII retaliation claim for frivolity review purposes. She has plausibly alleged (1) engagement in a protected activity—complaining about her treatment to supervisors and ultimately filing a Charge with the EEOC; (2) adverse employment action—her non-promotion and termination after complaining and filing the Charge; and, (3) a causal link—she appears to allege connection between her complaining about the hiring manager's harassment, her filing the Charge, and her termination. [DE-1-1] at 3–4. Accordingly, Plaintiff is allowed to proceed with her Title VII retaliation claim.

III. Conclusion

For the reasons stated herein, Plaintiff's application to proceed *in forma pauperis* is allowed, and Plaintiff is allowed to proceed with her claims of retaliation and sexual harassment under Title VII. The Clerk is DIRECTED to file the complaint and issue the summons prepared by Plaintiff, and the United States Marshal is DIRECTED to serve the summons and a copy of the complaint on Defendant.

So ordered the 26th day of October, 2022.



Robert B. Jones, Jr.
United States Magistrate Judge

**G.S. § 10B-41 NOTARIAL CERTIFICATE FOR
ACKNOWLEDGMENT**

Wake County, North Carolina

I certify that the following person(s) personally appeared before me this day, each acknowledging to me that he or she signed the foregoing document:

Christina Loper Name(s) of principal(s)

Date: 2/17/2025

Name(s) of principal(s)




Official Signature of Notary

Christopher C. Petefish, Notary Public
Notary's printed or typed name

My commission expires: February 6, 2028

OPTIONAL

This certificate is attached to a Title/Type of Document, signed by Name of Principal Signer(s)
on Date, and includes # of pages pages.