No.\_\_\_\_\_

### IN THE Supreme Court of the United States

DASAHN CROWDER, Petitioner,

v.

COMMONWEALTH OF MASSACHUSETTS, Respondent.

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

Pursuant to Supreme Court Rule 39, petitioner Dasahn Crowder respectfully requests leave to file the attached petition for a writ of certiorari without payment of fees and costs and to proceed *in forma pauperis*. In the courts below, Petitioner was found to be indigent and counsel was appointed to represent him pursuant to Mass. Gen. Laws ch. 211D, §§ 2, 5; Mass. R. Crim. P. 8; and Mass. Sup. Jud. Ct. R. 3:10.

On May 24, 2023, the Committee for Public Counsel Services ("CPCS"), which assigns counsel for indigent individuals, appointed present counsel to represent the petitioner on direct appeal from his conviction. On Apil 5, 2025, CPCS appointed present counsel to represent the petitioner before this Court on the instant Petition for a Writ of Certiorari. Copies of the relevant notices of assignment are attached.

Respectfully submitted,

Dated: June 21, 2025

<u>/s/ Hannah L. Taylor</u> HANNAH L. TAYLOR *Counsel of Record* Law Office of Michelle Menken 321 Walnut Street, No. 413 Newton, MA 02460 (617) 795-0459 HT@menkenesq.com

Counsel for Petitioner

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# CPCS Committee for Public Counsel Services Defending the People of Massachusetts

ANTHONY J. BENEDETTI CHIEF COUNSEL

## **Committee for Public Counsel Services**

Private Counsel Division 75 Federal Street, 6th Floor, Boston, MA 02110 Tel: 617-482-6212 - Fax: 617-988-8493

> VANESSA VELEZ DEPUTY CHIEF COUNSEL

ELIZABETH DEMBITZER DIRECTOR OF CRIMINAL APPEALS

To: Hannah Taylor 50 Congress Street, Suite 600 Boston, Ma 02110

From: Dorothy Mele, Assignment Coordinator Date: May 24, 2023 Subject: Commonwealth v. Dasahn Crowder, Malden District Court 2150CR0019

Dear Attorney

Your Notice of Assignment of Counsel (NAC) has been issued electronically and should appear in your ebill account. Please file your appearance in the appropriate court and provide the client with your contact information immediately. Please remember you must meet with your client at least once after you have reviewed the transcripts and that you should forward a copy of the brief to this office upon filing. Please also email the direct appeal checklist.

You should not withdraw from this case or file a motion to dismiss the appeal without first conferring with Elizabeth Dembitzer, Director of Criminal Appeals, Private Counsel Division.

If you wish to pursue a Rule 30 motion for new trial, or any other collateral attack where there is no right to counsel, you must first obtain approval from Elizabeth Dembitzer. Please email her at <u>edembitzer@publiccounsel.net</u> the reasons why you believe the collateral attack is meritorious.

If you believe that your client will benefit from a G.L. c.278A motion for forensic testing, please contact the CPCS Innocence Program. They must review any filing under the statute prior to your filing it.

If your client is not a U.S. citizen and there is a possibility that your client may be deported as a result of the conviction, you must contact the CPCS Immigration Impact Unit at <u>iiu@publicccounsel.net</u> or 617-623-0591.

Please review and adhere to all Performance Standards Governing the Representation of Clients in Criminal Appeals and Post-Conviction Matters, as set forth in the CPCS Assigned Counsel manual which can be found at: https://www.publiccounsel.net/assigned-counsel-manual/

If you have any questions regarding this assignment, please contact Dorothy Mele at <u>dmele@publiccounsel.net</u>

### MUR\*10

5/24/23, 3:31 PM

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### Hannah Taylor

From:	Dorothy Mele <dmele@publiccounsel.net></dmele@publiccounsel.net>
Sent:	Saturday, April 5, 2025 11:36 AM
То:	Hannah Taylor
Subject:	NAC for Assignment for Petition for Writ of Certiorari - Dasahn Crowder

Hi Attorney Taylor.

At the direction of Elizabeth Dembitzer, Director of Criminal Appeals, Private Counsel Division, Committee for Public Counsel, you have been assigned as appointed counsel to represent Dasahn Crowder for purposes of pursuing a Petition for Writ of Certiorari.

NAC #D28177940 has been electronically issued to you, effective April 2, 2025, and should appear in your ebill account.

On behalf of the Committee for Public Counsel, thank you for accepting this assignment.

Dolly

Dolly Mele Murder/Post-Conviction Assignment Coordinator CPCS Direct Line: 617-910-5796