

NO. _____ (CAPITAL CASE)

**IN THE
SUPREME COURT OF THE UNITED STATES**

ARTHUR BROWN, JR.,

Petitioner,

v.

THE STATE OF TEXAS,

Respondent.

**On Petition for a Writ of Certiorari to
The Court of Criminal Appeals of Texas**

MOTION TO PROCEED IN FORMA PAUPERIS

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MOTION TO PROCEED IN FORMA PAUPERIS

NOW COMES, Petitioner, Arthur Brown, Jr., and respectfully requests to proceed *in forma pauperis*. In support, Mr. Brown would show the following:

1. Mr. Brown is now and has always been eligible to proceed in the federal courts as a pauper.

2. In 2009, Undersigned Counsel was appointed counsel for Mr. Brown by the United States District Court for the Southern District of Texas, Houston Division, in accordance with 18 U.S.C. § 3599 (requiring appointment of counsel in capital habeas corpus proceedings for a person “financially unable to obtain adequate representation or investigative, expert, or other reasonably necessary services”). Counsel has continuously represented Mr. Brown in that capacity ever since, including in the courts below.

WHEREFORE, PREMISES CONSIDERED, Petitioner, Arthur Brown, Jr., prays that this Court grant this motion and grant him any and all other relief to which he may be entitled.

February 26, 2018

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I, Paul E. Mansur, hereby certify that a true and correct electronic version of this Motion to Proceed *In Forma Pauperis*, was served on opposing counsel on February 26, 2018, via e-mail to:

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/s/ Paul E. Mansur
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