

No. 18-431

IN THE

SUPREME COURT OF THE UNITED STATES

UNITED STATES OF AMERICA,
Petitioner

vs.

ANDRE LEVON GLOVER,
Respondent

ON WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS
FOR THE FIFTH CIRCUIT

MOTION FOR APPOINTMENT OF COUNSEL

J. JOSEPH MONGARAS
Texas Bar Card No. 24039975

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Counsel for Respondent Andre Levon Glover

MOTION FOR APPOINTMENT OF COUNSEL

Respondent Andre Levon Glover hereby moves, pursuant to 18 U.S.C § 3006A and Supreme Court Rule 39.6 and 39.7, for appointment of J. Joseph Mongaras as his counsel in this matter. In support of this motion, respondent supplies the following information:

1. This Court granted certiorari and respondent's motion to proceed *in forma pauperis* in this this case on January 4, 2019.
2. Mr. Mongaras is well qualified to undertake this representation. He was appointed to represent Respondent Glover at trial and represented Respondent Glover as lead counsel before the Fifth Circuit Court of Appeals, briefing and arguing his case to the original three-judge panel.
3. He was counsel of record for Respondent Glover by appointment from the Fifth Circuit.
4. Mr. Mongaras continued his CJA representation of Respondent Glover throughout the certiorari phase of this case before this Court, helping with Respondent's consolidated briefing.
5. Once the government's petition for certiorari was granted, Mr. Mongaras and Brandon Elliot Beck of Federal Public Defenders agreed that Mr. Beck would conduct oral argument and both have entered an appearance as counsel of record for both Respondents in this case matter. Mr. Mongaras nevertheless continued his representation in this matter, consulting with co-counsel on briefing, drafting and editing the merits response brief regarding this case. Mr. Mongaras has also invested substantial time in assisting Mr. Beck with his preparation for argument this case. Mr. Mongaras will also be attending oral argument on behalf of Respondent Glover and to assist Mr. Beck at argument.
6. While Mr. Mongaras in in private practice, he has devoted a great deal of time within his practice to federal CJA appointed cases at both the appellate and district court level.
7. Mr. Mongaras has been a member in good standing of the Texas State Bar since 2006. He

is also a member of the Bar of this Court.

CONCLUSION

For the foregoing reasons, Respondent Glover respectfully requests that this Court Appoint J. Joseph Mongaras as his counsel in this case.

Date: April 5, 2019

Respectfully submitted,

/s/ J. Joseph Mongaras

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