

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

THO MAS CAVES,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.


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*.

Petitioner has previously been granted leave to proceed *in forma pauperis* in the following court: United States District Court for the Northern District of New York.

Undersigned counsel was appointed to represent petitioner pursuant to the Criminal Justice Act of 1964, 18 U.S.C.A. §3006A by the Second Circuit Court of Appeals on March 10, 2023. A copy of the Order of Appointment is attached as Exhibit A.

Dated: Garden City, New York
March 17, 2025



Peter J. Tomao, Esq.
CJA Counsel for Petitioner-Defendant
Thomas Caves

Exhibit A

**UNITED STATES COURT OF APPEALS
FOR THE
SECOND CIRCUIT**

At a Stated Term of the United States Court of Appeals for the Second Circuit, held at the Thurgood Marshall United States Courthouse, 40 Foley Square, in the City of New York, on the 10th day of March, two thousand twenty-three.

United States of America,

ORDER

Appellee,

Docket No. 23-6176

v.

Thomas Caves,

Defendant – Appellant.

Marc Alan Zuckerman moves to be relieved as counsel for Appellant.

IT IS HEREBY ORDERED that the motion to be relieved is GRANTED. Peter J. Tomao, Esq., 600 Old Country Road, Suite 328, Garden City, NY 11530, is assigned as new counsel pursuant to the Criminal Justice Act, 18 U.S.C. § 3006A. Attorney Tomao is directed to review Local Rule 31.2 regarding procedures for setting the filing dates for the submission of briefs.

For the Court:
Catherine O'Hagan Wolfe,
Clerk of Court

The signature of Catherine O'Hagan Wolfe is written in black ink over a circular seal. The seal is the official seal of the United States Court of Appeals for the Second Circuit, featuring the text "UNITED STATES", "SECOND CIRCUIT", and "COURT OF APPEALS" around a central emblem.