

CAPITAL CASE
EXECUTION SCHEDULED FOR APRIL 23, 2025, 6:00PM CST
No. ____

IN THE
Supreme Court of the United States

MOISES SANDOVAL MENDOZA,

Petitioner,

v.

STATE OF TEXAS,

Respondent.

ON PETITION FOR A WRIT OF CERTIORARI
TO THE COURT OF CRIMINAL APPEALS OF TEXAS

MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*

Petitioner asks for leave to file a Petition for Certiorari without prepayment of costs and to proceed *in forma pauperis*. Petitioner did not seek IFP status in his most recent state-court proceedings. He was represented in those proceedings by (undersigned) pro bono counsel at O'Melveny & Myers LLP. Petitioner did receive IFP status in his federal habeas proceedings. *See* Order, *Mendoza v. Director, TDCJ-CID*, No. 5:09-cv-00086 (E.D. Tex.), ECF No. 3. Petitioner initially was represented in those proceedings by Lydia Brandt, who was appointed by the district court pursuant to 18 U.S.C. § 3599(a). *See id.*, ECF Nos. 1, 3. Jeff Haas was eventually added as supplemental counsel, *see id.*, ECF No. 76, after which undersigned pro bono counsel represented Petitioner, *see id.*, ECF No. 117. Jeffrey Ertel has also been appointed in federal district court to represent Petitioner under 18 U.S.C. § 3599(a).

See id., ECF No. 137. In light of these prior appointments, no affidavit or declaration of respondent is attached. *See* S. Ct. R. 39.1.

DATED: April 18, 2025

/s/ Jason Zarrow

Melissa C. Cassel-Walker
Evan Hindman
O'MELVENY & MYERS LLP
Two Embarcadero Center
San Francisco, CA 94111

Jason Zarrow
Counsel of Record
Hana Stodder
O'MELVENY & MYERS LLP
400 S. Hope Street,
19th Floor
Los Angeles, CA 90071
(213) 430-8367
jzarrow@omm.com

Attorneys for Petitioner
