

No. 25-529

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In the Supreme Court of the United States

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MIKE BROWN, WARDEN, PETITIONER

v.

LOUIS CHANDLER, RESPONDENT

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ON PETITION FOR A WRIT OF CERTIORARI TO THE  
UNITED STATES COURT OF APPEALS FOR THE  
SIXTH CIRCUIT

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

**ORDER APPOINTING COUNSEL**

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**Jessica Zimbelman (P72042)**  
**Deputy Director**  
*Counsel of Record*

**State Appellate Defender Office**  
**200 N. Washington, Suite 250**  
**Lansing, MI 48913**  
**Phone: (313) 256-9833**  
**jzimbelman@sado.org**

**Attorney for Louis Chandler**

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

Respondent Louis Chandler, through his appointed counsel, the State Appellate Defender Office (“SADO”), by Jessica Zimbelman, respectfully asks this Honorable Court for leave to proceed *in forma pauperis* pursuant to Rule 39. The state trial court found Mr. Chandler to be indigent and it appointed SADO, Michigan’s state-wide appellate public defender office, to represent Mr. Chandler on appeal. (See attached order of appointment). SADO has continuously represented him on appeal from these convictions. Mr. Chandler has been incarcerated for over 10 years in relation to the offenses SADO was appointed to represent him on.

Respectfully submitted,

/s/ Jessica Zimbelman  
Jessica Zimbelman (P72042)\*  
Deputy Director  
\*Counsel of Record for Mr. Chandler

Dated: February 4, 2026

## Order of Appointment

STATE OF MICHIGAN 17th JUDICIAL CIRCUIT KENT COUNTY	CLAIM OF APPEAL AND ORDER APPOINTING COUNSEL	CASE NO. AND SUFFIX 15-03589 FC 28864
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Court Address  
180 OTTAWA, NW, GRAND RAPIDS, MI 49503

Court Phone No.  
616-632-5480

CA# 319605

People of THE STATE OF MICHIGAN	Date of Birth, Address, Inmate Number (if known)	12/04/1954	
V		CHIPPEWA CORRECTIONAL FACILITY 4269 WEST M-80	963822
Defendant Name, Last CHANDLER	First LOUIS	Middle CHARLES	✓ KINCHELOE, MI 49784 11-3-10

Offense Information						Terms of Incarceration						Intermediate Sanctions								
Description	PACC Code	Minimum			Maximum			Probation			Intermediate Sanctions									
		H	C	A	S	Y	M	D	Y	M	D	K	P	J	Y	M	D	R	F	O
CSC-1ST/PERSON UNDER 13/DEFENDANT 17 OR OLDER	750.520B2B					25			75			X								X
CSC-1ST/PERSON UNDER 13/DEFENDANT 17 OR OLDER	750.520B2B					25			75			X								

H=Habitual C=Conspiracy A=Attempt S=Solicitation Y=Year M=Month D=Day K=Consecutive P=Prison J=Jail F=Fine O=Other

The defendant claims an appeal from a final judgment or order entered on 08/20/2015 in the 17th Circuit Court, KENT County, Michigan by Judge MARK A. TRUSOCK 38156. Copies of the final judgment or order being appealed and docket entries are attached for the Court of Appeals, appointed counsel, and Michigan Appellate Assigned Counsel System.

On 08/20/2015, the defendant filed a request for appointment of counsel and a declaration of indigency.

IT IS ORDERED:

STATE APPELLATE DEFENDER OFFICE

645 GRISWOLD, PENOBCOT BLDG., SUITE 3300

Name of Appellate Counsel

Address

DETROIT, MI 48226

313-256-9833

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City, State, ZIP Code

Telephone No.

Bar No.

Is appointed counsel for the defendant in post-conviction proceedings. If appointed counsel can not or will not accept this appointment, he/she shall notify the court immediately. Copies of the final judgment or order being appealed and docket entries are attached for appointed counsel and Michigan Appellate Assigned Counsel System (MAACS).

The court reporter(s)/recorder(s) shall file with the trial court clerk the transcripts checked below and any other transcripts requested by counsel in this case not previously transcribed. Transcripts shall be filed within 28 days for pleas or 91 days for trials from the date ordered or requested [MCR 7.20(B)]. Reporter(s)/recorder(s) shall be paid as provided by law.

Transcripts Ordered	Reporter/Recorder Name	Other Description	Previously Ordered	Previously Filed	Reporter Number	Date(s) of Proceeding
JURY TRIAL	TRACY KNIFFEN-OATES	JAVS			1428	07/06/2015
JURY TRIAL	TRACY KNIFFEN-OATES	JAVS			1428	07/07/2015
JURY TRIAL	TRACY KNIFFEN-OATES	JAVS			1428	07/08/2015
JURY TRIAL	TRACY KNIFFEN-OATES	JAVS			1428	07/09/2015
SENTENCE	TRACY KNIFFEN-OATES	JAVS			1428	08/20/2015

The clerk shall immediately send to counsel a copy of the transcripts ordered above or requested by counsel as they become available. The clerk shall forward documents upon request by counsel [MCR 6.433].

**MARK A. TRUSOCK**

OCT 07 2015

MARK A. TRUSOCK  
Judge

38156  
Bar No.

**RECEIVED**

OCT 09 2015

**CERTIFICATE OF MAILING**

I certify that on this date I mailed a copy of this claim of appeal to appointed counsel, defendant, court reporter(s)/recorder(s), prosecutor, Court of Appeals, and the Michigan Appellate Assigned Counsel System (MAACS). I also mailed a copy of the final judgment or order being appealed and the docket entries to appointed counsel, the Court of Appeals, and MAACS. I also mailed a copy of the defendant's request for appointment of counsel to appointed counsel, the prosecutor, and MAACS.

**OCT 07 2015**

**MARY BOUCHER**

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Date

Signature