

No. _____

IN THE
**Supreme Court of the
United States**

STEVEN PITTS,

Petitioner,

v.

STATE OF NEW YORK,

Respondent.

On Petition for Writ of Certiorari
to the Appellate Division First
Judicial Department of the Supreme
Court of the State of New York.

MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS

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MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS

Petitioner Steven Pitts moves for leave to proceed *in forma pauperis*, and to file the enclosed Petition for a Writ of Certiorari.

On May 26, 2022 and October 24, 2023, Petitioner was granted, under New York County Law § 722, leave to so proceed in the Supreme Court of the State of New York, Appellate Division, First Judicial Department. A copy of both orders is attached hereto.

RESPECTFULLY SUBMITTED on August 13, 2025.

By: 

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Appellate Division, First Judicial Department

BEFORE: Hon. Martin Shulman
Justice of the Appellate Division

The People of the State of New York,
Respondent,

Motion No. 2023-04255
Ind. No. 1614/2020
Case No. 2023-04854

-against-

Steven Pitts,
Defendant-Appellant.

**CERTIFICATE
GRANTING
LEAVE**

I, Martin Shulman, a Justice of the Appellate Division, First Judicial Department, do hereby certify that in the proceedings herein questions of law or fact are involved which ought to be reviewed by the Appellate Division, First Judicial Department, and, pursuant to Section 460.15 of the Criminal Procedure Law, permission is hereby granted to the above-named defendant to appeal to the Appellate Division, First Judicial Department, from the order of the Supreme Court, New York County, entered on or about September 12, 2023.¹ Present counsel shall continue to represent defendant on the appeal of the aforesaid order.

Dated: October 19, 2023
New York, New York

Entered: October 24, 2023



Hon. Martin Shulman
Associate Justice

NOTICE: Within 15 days from the date hereon, an appeal must be taken, and this certificate must be filed with the notice of appeal. An appeal is taken by filing, in the Clerk's office of the criminal court in which the order sought to be appealed was rendered, a written notice in duplicate that appellant appeals to the Appellate Division, First Judicial Department (Section 460.10, subd. 4, CPL), together with proof that another copy of the notice of appeal has been served upon opposing counsel. The appeal

¹ In the event defendant has an existing (direct) appeal from a judgment, such appeal shall be consolidated with the appeal from the aforesaid order; and any poor person relief granted with respect to the appeal from the judgment shall be extended to cover the appeals so consolidated.

(or consolidated appeals; see footnote) must be argued within 120 days from the date of the notice of appeal, unless the time to perfect the appeal(s) is enlarged by the court or a justice thereof.

Supreme Court of the State of New York
Appellate Division, First Judicial Department

Present – Hon. Rolando T. Acosta,
Dianne T. Renwick
Sallie Manzanet-Daniels
Judith J. Gische
Barbara R. Kapnick,

Presiding Justice,

Justices.

The People of the State of New York,
Respondent,

Motion No. **2022-01635**

Ind. No. 1614/20

Case No. 2022-01617

-against-

Steven Pitts,
Defendant-Appellant.

An order of the Supreme Court, New York County, having been entered on or about March 28, 2022, inter alia, granting defendant poor person relief with respect to the appeal taken to this Court from the judgment of the Supreme Court, New York County, rendered on or about March 28, 2022,

Now, upon reading and filing the order which granted defendant poor person relief on appeal, and the notice of appeal filed on defendant's behalf,

It is ordered that the appeal shall be heard on the original record, except that a certified copy of the indictment(s) shall be substituted in place of the original indictment(s), and upon a reproduced appellant's brief, on condition that appellant serves one copy of such brief upon the District Attorney of said county and files with this Court an original, five hard copies and, if represented by counsel, one digital copy of such brief, together with the original record, pursuant to Section 1250.9 of the Practice Rules of the Appellate Division.

The court reporter shall promptly make and file with the criminal court (CPL §460.70) one transcript of the stenographic minutes of any proceedings pursuant to CPL §210.20, Arts. 710 and 730, and of the plea or trial and sentence. The Clerk shall furnish a copy of such transcripts to appellant's counsel, without charge, the transcripts to be returned to this Court when appellant's brief is filed.

Robert S. Dean, Esq., Center for Appellate Litigation, 120 Wall Street, 28th Floor, New York, New York, 10005, Telephone No. 212-577-2523, is assigned as counsel for defendant-appellant for purposes of the appeal. The time within which appellant shall perfect this appeal is hereby extended until 180 days from the date of receipt of the complete record.

ENTERED: May 26, 2022

A handwritten signature in black ink, appearing to read "Susanna Molina Rojas". The signature is fluid and cursive, with the first name "Susanna" being more prominent and the last name "Rojas" written in a more compact, stylized manner.

Susanna Molina Rojas
Clerk of the Court