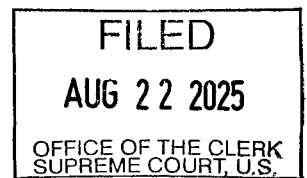


Doc No. **25-5505**



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**In the Supreme Court of the United States**

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Eliezer Taveras and Valeria Taveras  
*Petitioners,*

*v.*

U.S. Bank, National Association As Legal Title Trustee For  
Truman 2016 SC6 Title Trust,  
*Respondent*

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**On Petition for a Writ of Certiorari to the  
United States Court of Appeals  
for the Eleventh Circuit**

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

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**Eliezer Taveras**  
1445 NE 151 Terr.  
North Miami Beach, FL 33162  
(305) 515-4840  
[etaveras2020@gmail.com](mailto:etaveras2020@gmail.com)  
Pro se petitioner

**Valeria Taveras**  
1445 NE 151 Terr.  
North Miami Beach, FL 33162  
(305) 515-4840  
[valtaveras@yahoo.com](mailto:valtaveras@yahoo.com)  
Pro se petitioner

**Adam Diaz**  
Diaz Anselmo & Associates P.A.  
Counsel for Respondent  
1515 North Flagler Drive,  
Suite 220  
West Palm Beach, FL 33401  
Email: [adiaz@dallegal.com](mailto:adiaz@dallegal.com)

**August 21, 2025**

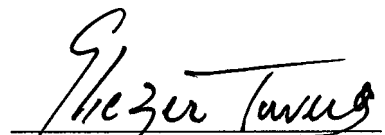
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## MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS

Petitioners respectfully move for leave to proceed in forma pauperis pursuant to Rule 39 of this Court. Petitioners have not previously sought leave to proceed in forma pauperis in the court below or any other court.

Petitioners are currently unemployed and without sufficient income or assets to pay the costs of printing and filing. Until May 2025, Petitioner Valeria Taveras was employed by the International Air Transport Association (IATA), where her position was eliminated following the closure of her department. Petitioners had relocated to Spain in 2018 in reliance on her employment but were compelled to return to the United States after her termination. Petitioner Eliezer Taveras is likewise unemployed, and both Petitioners are actively seeking work without success to date.

In light of these circumstances, Petitioners submit herewith their affidavit of indigency and respectfully request leave to proceed in forma pauperis.



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(305) 515-4840  
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1445 NE 151 Terr.  
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Pro se petitioner

## PROOF OF SERVICE

We hereby certify that on August 21, 2025, we caused a copy of the foregoing Motion for Leave to Proceed In Forma Pauperis (with attached affidavits/declarations), together with the Petition for a Writ of Certiorari and Appendix, to be served upon the following:

**Adam Diaz**  
**Counsel for Respondent U.S. Bank National Association**  
Diaz Anselmo & Associates P.A.  
1515 North Flagler Drive, Suite 220  
West Palm Beach, FL 33401  
Email: [adiatz@dallegal.com](mailto:adiatz@dallegal.com); [cortiz@dallegal.com](mailto:cortiz@dallegal.com)

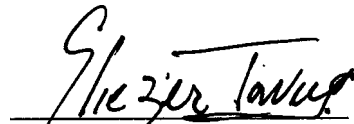
In addition, a copy of the foregoing was sent, via electronic mail and upon authorization, to:

**Braulio and Orquidea Grullon**  
Email: [jesuseslaguia@hotmail.com](mailto:jesuseslaguia@hotmail.com)

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 21, 2025.

Respectfully submitted,



Eliezer Taveras  
1445 NE 151 Terr.  
North Miami Beach, FL 33162  
(305) 515-4840  
[etaveras2020@gmail.com](mailto:etaveras2020@gmail.com)



Valeria Taveras  
1445 NE 151 Terr.  
North Miami Beach, FL 33162  
(305) 515-4840  
[valtaveras@yahoo.com](mailto:valtaveras@yahoo.com)  
Pro se petitioner

**AFFIDAVIT OR DECLARATION  
IN SUPPORT OF MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS***

I, Eliczer Taveras, am the petitioner in the above-entitled case. In support of my motion to proceed *in forma pauperis*, I state that because of my poverty I am unable to pay the costs of this case or to give security therefor; and I believe I am entitled to redress.

1. For both you and your spouse estimate the average amount of money received from each of the following sources during the past 12 months. Adjust any amount that was received weekly, biweekly, quarterly, semiannually, or annually to show the monthly rate. Use gross amounts, that is, amounts before any deductions for taxes or otherwise.

Income source	Average monthly amount during the past 12 months		Amount expected next month	
	You	Spouse	You	Spouse
Employment	\$ 0	\$ 2090 <sup>00</sup>	\$ 0	\$ 0
Self-employment	\$ 1080 <sup>00</sup>	\$ 0	\$ 0	\$ 0
Income from real property (such as rental income)	\$ 0	\$ 0	\$ 0	\$ 0
Interest and dividends	\$ 0	\$ 0	\$ 0	\$ 0
Gifts	\$ 0	\$ 0	\$ 0	\$ 0
Alimony	\$ 0	\$ 0	\$ 0	\$ 0
Child Support	\$ 0	\$ 0	\$ 0	\$ 0
Retirement (such as social security, pensions, annuities, insurance)	\$ 0	\$ 0	\$ 0	\$ 0
Disability (such as social security, insurance payments)	\$ 0	\$ 0	\$ 0	\$ 0
Unemployment payments	\$ 0	\$ 0	\$ 0	\$ 1000 <sup>00</sup>
Public-assistance (such as welfare)	\$ 0	\$ 0	\$ 0	\$ 0
Other (specify):	\$ 0	\$ 0	\$ 0	\$ 0
<b>Total monthly income:</b>	<b>\$ 1080<sup>00</sup></b>	<b>\$ 2090</b>	<b>\$ 0</b>	<b>\$ 1000<sup>00</sup></b>

2. List your employment history for the past two years, most recent first. (Gross monthly pay is before taxes or other deductions.)

Employer	Address	Dates of Employment	Gross monthly pay
<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	\$ <u>N/A</u>
_____	_____	_____	\$ _____
_____	_____	_____	\$ _____

3. List your spouse's employment history for the past two years, most recent employer first. (Gross monthly pay is before taxes or other deductions.)

Employer	Address	Dates of Employment	Gross monthly pay
<u>IATA</u>	<u>Madrid Spain</u>	<u>May 2013</u>	\$ <u>2090<sup>00</sup></u>
_____	<u>Paseo de la Castellana 70</u>	<u>MAY 2025</u>	\$ _____
_____	<u>95</u>	_____	\$ _____

4. How much cash do you and your spouse have? \$ \_\_\_\_\_  
Below, state any money you or your spouse have in bank accounts or in any other financial institution.

Type of account (e.g., checking or savings)	Amount you have	Amount your spouse has
<u>Checking</u>	\$ <u>-27<sup>00</sup></u>	\$ <u>0</u>
_____	\$ _____	\$ _____
_____	\$ _____	\$ _____

5. List the assets, and their values, which you own or your spouse owns. Do not list clothing and ordinary household furnishings.

☐ Home  
Value N/A

☐ Other real estate  
Value \_\_\_\_\_

☐ Motor Vehicle #1  
Year, make & model Skoda 2016  
Value 1500<sup>00</sup>

☐ Motor Vehicle #2  
Year, make & model \_\_\_\_\_  
Value \_\_\_\_\_

☐ Other assets  
Description \_\_\_\_\_  
Value \_\_\_\_\_

6. State every person, business, or organization owing you or your spouse money, and the amount owed.

**Person owing you or your spouse money**

**Amount owed to you**

**Amount owed to your spouse**

N/A  
\_\_\_\_\_  
\_\_\_\_\_

\$ N/A  
\$ \_\_\_\_\_  
\$ \_\_\_\_\_

\$ N/A  
\$ \_\_\_\_\_  
\$ \_\_\_\_\_

7. State the persons who rely on you or your spouse for support. For minor children, list initials instead of names (e.g. "J.S." instead of "John Smith").

**Name**  
N/A  
\_\_\_\_\_  
\_\_\_\_\_

**Relationship**  
N/A  
\_\_\_\_\_  
\_\_\_\_\_

**Age**  
N/A  
\_\_\_\_\_  
\_\_\_\_\_

8. Estimate the average monthly expenses of you and your family. Show separately the amounts paid by your spouse. Adjust any payments that are made weekly, biweekly, quarterly, or annually to show the monthly rate.

	You	Your spouse
Rent or home-mortgage payment (include lot rented for mobile home)	\$ <u>0</u>	\$ <u>500</u>
Are real estate taxes included? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Is property insurance included? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Utilities (electricity, heating fuel, water, sewer, and telephone)	\$ <u>0</u>	\$ <u>100</u>
Home maintenance (repairs and upkeep)	\$ <u>0</u>	\$ <u>0</u>
Food	\$ <u>0</u>	\$ <u>300</u>
Clothing	\$ <u>0</u>	\$ <u>0</u>
Laundry and dry-cleaning	\$ <u>0</u>	\$ <u>0</u>
Medical and dental expenses	\$ <u>50</u>	\$ <u>0</u>

	You	Your spouse
Transportation (not including motor vehicle payments)	\$ <u>30</u>	\$ <u>30</u>
Recreation, entertainment, newspapers, magazines, etc.	\$ <u>0</u>	\$ <u>0</u>
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	\$ <u>0</u>	\$ <u>0</u>
Life	\$ <u>0</u>	\$ <u>0</u>
Health	\$ <u>0</u>	\$ <u>0</u>
Motor Vehicle	\$ <u>0</u>	\$ <u>0</u>
Other: _____	\$ <u>0</u>	\$ <u>0</u>
Taxes (not deducted from wages or included in mortgage payments)		
(specify): _____	\$ <u>0</u>	\$ <u>0</u>
Installment payments		
Motor Vehicle	\$ <u>0</u>	\$ <u>0</u>
Credit card(s)	\$ <u>180<sup>00</sup></u>	\$ <u>0</u>
Department store(s)	\$ <u>0</u>	\$ <u>0</u>
Other: _____	\$ <u>0</u>	\$ <u>0</u>
Alimony, maintenance, and support paid to others	\$ <u>0</u>	\$ <u>0</u>
Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$ <u>0</u>	\$ <u>0</u>
Other (specify): _____	\$ <u>0</u>	\$ <u>0</u>
<b>Total monthly expenses:</b>	\$ <u>240<sup>00</sup></u>	\$ <u>930<sup>00</sup></u>

9. Do you expect any major changes to your monthly income or expenses or in your assets or liabilities during the next 12 months?

☐ Yes ☒ No If yes, describe on an attached sheet.

*Although Applying For Job.*

10. Have you paid – or will you be paying – an attorney any money for services in connection with this case, including the completion of this form? ☒ Yes ☐ No

If yes, how much? \_\_\_\_\_

If yes, state the attorney's name, address, and telephone number:

*Adam Diaz  
1515 North Flagler Dr. Suite 220  
West Palm Beach FL 33401*

*Ph: 954-564-0071*

11. Have you paid—or will you be paying—anyone other than an attorney (such as a paralegal or a typist) any money for services in connection with this case, including the completion of this form?

☐ Yes ☒ No

If yes, how much? \_\_\_\_\_

If yes, state the person's name, address, and telephone number:

12. Provide any other information that will help explain why you cannot pay the costs of this case.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: *August 21*, 20*25*

*[Signature]*  
(Signature)



**AFFIDAVIT OR DECLARATION  
IN SUPPORT OF MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS***

I, VALENTIA TAVERAS, am the petitioner in the above-entitled case. In support of my motion to proceed *in forma pauperis*, I state that because of my poverty I am unable to pay the costs of this case or to give security therefor; and I believe I am entitled to redress.

1. For both you and your spouse estimate the average amount of money received from each of the following sources during the past 12 months. Adjust any amount that was received weekly, biweekly, quarterly, semiannually, or annually to show the monthly rate. Use gross amounts, that is, amounts before any deductions for taxes or otherwise.

Income source	Average monthly amount during the past 12 months		Amount expected next month	
	You	Spouse	You	Spouse
Employment	\$ <u>2090</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Self-employment	\$ <u>0</u>	\$ <u>1080</u>	\$ <u>0</u>	\$ <u>0</u>
Income from real property (such as rental income)	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Interest and dividends	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Gifts	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Alimony	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Child Support	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Retirement (such as social security, pensions, annuities, insurance)	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Disability (such as social security, insurance payments)	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Unemployment payments	\$ <u>0</u>	\$ <u>0</u>	\$ <u>1.000</u>	\$ <u>0</u>
Public-assistance (such as welfare)	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Other (specify): <u>N/A</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
<b>Total monthly income:</b>	\$ <u>2090</u>	\$ <u>1080</u>	\$ <u>1.000</u>	\$ <u>0</u>

2. List your employment history for the past two years, most recent first. (Gross monthly pay is before taxes or other deductions.)

Employer	Address	Dates of Employment	Gross monthly pay
IATA	PASEO DE LA CASTELLANA 95, MADRID, SP	MAY 2013 TO MAY 2025	\$ 2.090.00
			\$
			\$

3. List your spouse's employment history for the past two years, most recent employer first. (Gross monthly pay is before taxes or other deductions.)

Employer	Address	Dates of Employment	Gross monthly pay
N/A		N/A	\$ 0
			\$
			\$

4. How much cash do you and your spouse have? \$  
Below, state any money you or your spouse have in bank accounts or in any other financial institution.

Type of account (e.g., checking or savings)	Amount you have	Amount your spouse has
CHECKING	\$ 27.00	\$ 0
	\$	\$
	\$	\$

5. List the assets, and their values, which you own or your spouse owns. Do not list clothing and ordinary household furnishings.

<input type="checkbox"/> Home Value N/A	<input type="checkbox"/> Other real estate Value
<input type="checkbox"/> Motor Vehicle #1 Year, make & model N/A Value	<input type="checkbox"/> Motor Vehicle #2 Year, make & model Skoda Value 15000
<input type="checkbox"/> Other assets Description N/A Value	

6. State every person, business, or organization owing you or your spouse money, and the amount owed.

Person owing you or your spouse money	Amount owed to you	Amount owed to your spouse
N/A	\$ 0	\$ 0
	\$	\$
	\$	\$

7. State the persons who rely on you or your spouse for support. For minor children, list initials instead of names (e.g. "J.S." instead of "John Smith").

Name	Relationship	Age
N/A		

8. Estimate the average monthly expenses of you and your family. Show separately the amounts paid by your spouse. Adjust any payments that are made weekly, biweekly, quarterly, or annually to show the monthly rate.

	You	Your spouse
Rent or home-mortgage payment (include lot rented for mobile home)	\$ 500.00	\$ 0
Are real estate taxes included? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Is property insurance included? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Utilities (electricity, heating fuel, water, sewer, and telephone)	\$ 100.00	\$ 0
Home maintenance (repairs and upkeep)	\$ 0	\$ 0
Food	\$ 300.00	\$ 0
Clothing	\$ 0	\$ 0
Laundry and dry-cleaning	\$ 0	\$ 0
Medical and dental expenses	\$ 0	\$ 50

	You	Your spouse
Transportation (not including motor vehicle payments)	\$ <u>30</u>	\$ <u>30</u>
Recreation, entertainment, newspapers, magazines, etc.	\$ <u>0</u>	\$ <u>0</u>
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	\$ <u>0</u>	\$ <u>0</u>
Life	\$ <u>0</u>	\$ <u>0</u>
Health	\$ <u>0</u>	\$ <u>0</u>
Motor Vehicle	\$ <u>0</u>	\$ <u>0</u>
Other: _____	\$ <u>0</u>	\$ <u>0</u>
Taxes (not deducted from wages or included in mortgage payments)		
(specify): _____	\$ <u>0</u>	\$ <u>0</u>
Installment payments		
Motor Vehicle	\$ <u>0</u>	\$ <u>0</u>
Credit card(s)	\$ <u>0</u>	\$ <u>180<sup>00</sup></u>
Department store(s)	\$ <u>0</u>	\$ <u>0</u>
Other: _____	\$ <u>0</u>	\$ <u>0</u>
Alimony, maintenance, and support paid to others	\$ <u>0</u>	\$ <u>0</u>
Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$ <u>0</u>	\$ <u>0</u>
Other (specify): _____	\$ <u>0</u>	\$ <u>0</u>
<b>Total monthly expenses:</b>	\$ <u>930</u>	\$ <u>260</u>

9. Do you expect any major changes to your monthly income or expenses or in your assets or liabilities during the next 12 months?

☐ Yes ☒ No If yes, describe on an attached sheet.

10. Have you paid – or will you be paying – an attorney any money for services in connection with this case, including the completion of this form? ☒ Yes ☐ No

If yes, how much? OVER 20,000<sup>00</sup>

If yes, state the attorney's name, address, and telephone number:

ADAN DIAZ  
1515 NORTH FLAGLER DRIVE SUITE 220  
WEST PALM BEACH, FL 33401 94954-564-0071

11. Have you paid—or will you be paying—anyone other than an attorney (such as a paralegal or a typist) any money for services in connection with this case, including the completion of this form?

☐ Yes ☒ No

If yes, how much? \_\_\_\_\_

If yes, state the person's name, address, and telephone number:

12. Provide any other information that will help explain why you cannot pay the costs of this case.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: AVG. 21, 2025



(Signature)