

No. 25-6258

IN THE  
SUPREME COURT OF THE UNITED STATES

Pamela S. Julian — PETITIONER

ORIGINAL

VS.

Dhurata Ametaj et al — RESPONDENT(S)  
MASSACHUSETTS SUPREME COURT

FILED  
MAR 17 2025  
OFFICE OF THE CLERK  
SUPREME COURT, U.S.

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*.

Please check the appropriate boxes:

Petitioner has previously been granted leave to proceed *in forma pauperis* in the following court(s):

MA Norfolk Superior Court

MA Appeals Court

MA Supreme Court

Petitioner has not previously been granted leave to proceed *in forma pauperis* in any other court.

Petitioner's affidavit of indigency in support of this motion is attached hereto.

Petitioner's affidavit or declaration is not attached because the court below appointed counsel in the current proceeding, and:

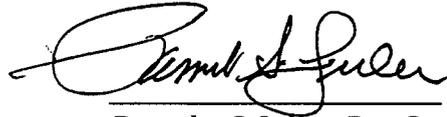
The appointment was made under the following provision of law: \_\_\_\_\_

RECEIVED  
OCT 27 2025  
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SUPREME COURT, U.S.

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AUG 19 2025  
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JUN 11 2025  
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MAR 21 2025  
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SUPREME COURT, U.S.

A handwritten signature in black ink, appearing to read "Pamela S. Julian". The signature is fluid and cursive, with a large initial "P" and "J".

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617-694-3797

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

I, Pamela S. Julian, 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.

- 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
Employment	\$0 _____	\$N/A _____	\$0 _____
Self-employment	\$0 _____	\$N/A _____	\$0 _____
Income from real property (such as rental income)	\$0 _____	\$N/A _____	\$0 _____
Interest and dividends	\$0 _____	\$N/A _____	\$0 _____
Gifts	\$0 _____	\$N/A _____	\$0 _____
Alimony	\$0 _____	\$N/A _____	\$0 _____
Child Support	\$0 _____	\$N/A _____	\$0 _____
Retirement (such as social security, pensions, annuities, insurance)	\$0 _____	\$N/A _____	\$0 _____
Disability (such as social security, insurance payments)	\$0 _____	\$N/A _____	\$0 _____
Unemployment payments	\$0 _____	\$N/A _____	\$0 _____
Public-assistance (such as welfare)	\$0 _____	\$N/A _____	\$0 _____

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

Employer: none	Address: N/A	Dates of Employment: N/A	Gross monthly pay
_____	_____	_____	\$0 _____
_____	_____	_____	\$0 _____
_____	_____	_____	\$0 _____

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: N/A	Address: N/A	Dates of Employment: N/A	Gross monthly pay:
_____	_____	_____	\$ N/A _____
_____	_____	_____	\$ N/A _____
_____	_____	_____	\$ N/A _____

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 _____	\$ 109.04 _____	N / A \$ _____
Checking _____	\$ 44.36 _____	N / A \$ _____
Savings _____	\$ 25.00 _____	N / A \$ _____

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

D Home  
Value \$996.700 town assement

D Other real estate None  
Value: N/A \_\_\_\_\_

D Motor Vehicle #1 None  
Year, make & model \_\_\_\_\_  
Value \_\_\_\_\_

D Motor Vehicle #2 None  
Year, make & model \_\_\_\_\_  
Value \_\_\_\_\_

D Other assets: None  
Description \_\_\_\_\_  
Value \_\_\_\_\_

Other (specify): \_\_\_\_\_ \$0 \_\_\_\_\_ \$N/A \_\_\_\_\_ \$0 \_\_\_\_\_

**Total monthly income:** \$0 \_\_\_\_\_ \$N/A \_\_\_\_\_ \$0 \_\_\_\_\_

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
<u>Dhurata &amp; Arian Ametaj</u>	<u>\$ 25,362.94 plus interest</u>	<u>\$N/A</u>
<u>N/A</u>	<u>\$ N/A</u>	<u>\$N/A</u>
<u>N/A</u>	<u>\$N/A</u>	<u>\$N/A</u>

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: None	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) Are real estate taxes included? N/A Real Estate Taxes  property insurance included? N/A	<u>\$ 0</u>	<u>\$N/A</u>
Utilities (electricity, heating fuel, water, sewer, and telephone)	<u>\$350.40</u>	<u>\$N/A</u>
Home maintenance (repairs and upkeep)	<u>\$100</u>	<u>\$N/A</u>
Food	<u>\$345</u>	<u>\$N/A</u>
<u>Clothing</u>	<u>\$20</u>	<u>\$N/A</u>

Laundry and dry-cleaning	\$5_____	\$0_____
Medical and dental expenses [medicare/mass health recipient]	\$0_____	\$0_____

	<b>You</b>	<b>Your spouse</b>
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Transportation (not including motor vehicle payments)	\$20_____	\$ N/A_____
Recreation, entertainment, newspapers, magazines, etc.	\$0_____	\$. N/A_____

Insurance (not deducted from wages or included in mortgage payments)

Condo. Homeowner's & Work Comp Ins. <del>or renter's</del>	\$154.54_____	\$N/A_____
Life	\$0_____	\$N/A_____
Health [69 year old senior: medicare/masshealth]	\$0_____	\$N/A_____
Motor Vehicle	\$0_____	\$N/A_____
Other: _____	\$0_____	\$N/A_____

Taxes (not deducted from wages or included in mortgage payments)

(specify): property tax _____	\$590.13_____	\$N/A_____
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Installment payments

Motor Vehicle	\$ N/A_____	\$N/A_____
Credit card(s)	\$300_____	\$N/A_____
Department store(s)	\$ 0_____	\$N/A_____
Other: _____	\$ 0_____	\$N/A_____

Alimony, maintenance, and support paid to others	\$0_____	\$N/A_____
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Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$N/A_____	\$N/A_____
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Other (specify): \_\_\_\_\_

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

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

Total monthly expenses:

\$1,884.67 \_\_\_\_\_

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

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      **X 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      **X No**

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

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

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      **X No**

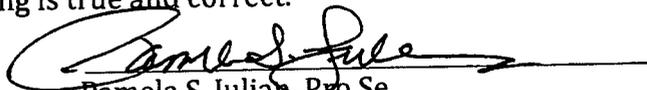
If yes, how much? \_\_\_\_\_

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.

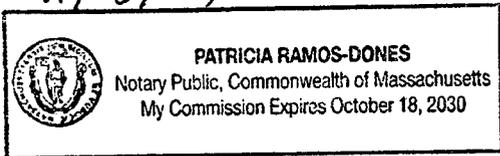
I am a single, unemployed, 69-year-old senior citizen with no savings, retirement, or social security funds. Whereas this petitioner is not eligible for a bank loan and there is no clear title to 11-15 Condominium residence at this time. In addition to the financial statement above, the federal student loan in the amount of \$50,000 is due but currently deferred due to my economic status. My son and fiancée assist in monthly household and common area expenses.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on November 13, 2024



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11/13/24



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