

No. 25-889

In the Supreme Court of the United States

G.G.,
Petitioner

v.

ALLEGHENY COUNTY OFFICE OF CHILDREN, YOUTH AND FAMILIES, et al.,
Respondent

Motion for Leave to File in Forma Pauperis (IFP) as a Respondent in Support of the
Writ of Certiorari to the Pennsylvania Superior Court of Appeals

MOTION FOR LEAVE TO FILE, *IN FORMA PAUPERIS*

Timothy Green *-pro se*

3 Parkview Dr.
Clinton, PA 15026
(412) 722-5843
Pro se Respondent

February 24, 2026

MOTION FOR LEAVE TO FILE, *IN FORMA PAUPERIS*

AND NOW, the respondent is coming before this Court to request the ability to be able to proceed *In Forma Pauperis*, in case number 25-889. I am asking this Court for this consideration because our family has had multiple setbacks in the last three months. Five months ago it would not have been a problem to proceed normally before this court, but between December and January, things turned upside down in my family and part of it is related to this case.

My wife already had health issues and was unable to work, but that was not a problem initially. Then in December when I was dealing with a health issue, the facility that I was in literally almost killed me. This cardiac arrest caused an acute kidney injury and required a lengthy stay in the hospital. While I am healing more now, I still have to take it slower than I did before and am still currently on dialysis for the kidney injury from this incident. Things were still going pretty well financially during this time, because we had a close friend who is like part of the family who helps out as well.

When things got really bad is the issue that is related to this case. The case on appeal before this court is about the unlawful removal of M.G. due to the parent's use of a safety plan. The state took away the family's safety plan because they did not "like" it not because it was actually "unsafe". What was unsafe was the home at times when we did not have the safety plan. This ended up causing a state-created danger and this January after M.G. was released from the hospital. He got upset when his mother was trying to get him to go to bed. During this time, he got up and

started intimidating his mother and then turned on our friend, punching him in the head thirteen times, then throwing him to the floor and continuing to stomp on him. Through this he ended up breaking this person's shoulder and rendering him unable to work. This has cut the income dramatically down and made it hard to handle the extra expenses.

I wanted to explain my circumstances so you could see that I was not just trying to avoid paying any fees and doing the proper printing in booklet form. I originally had every intention of presenting my response in that form, but it is just not feasible at this time. Through this whole process our family would have qualified for the In Forma Pauperis, but we have chosen to pay as long as we were able including for transcripts. This is only the second time that I have requested In Forma Pauperis, the other time was with the Federal District Court on January 28, 2026.

PRIOR IN FORMA PAUPERIS REQUEST

On January 28, 2026 the three residents of 3 Parkview Dr, Clinton, PA 15026, filed an application for In Forma Pauperis with the Federal District Court of Western Pennsylvania. That was G.G., T.G. and Richard D. that were included in that approval. This was for the filing of a lawsuit. This application was accepted on January 30, 2026 and due to some paperwork issues, it was re-issued on February 17, 2026. As you can see this was very recent. I will include that approval with this

submission. No one in the family is currently paying attorney fees for any part of this process at this time.

As far as the income levels in the home Richard D. has a months Social Security Check of \$1600.00 and he gets a weekly home health payment for caring for a family member that is 700.00 weekly. So that is \$4400.00 each month. The regular bills that the family has each month is the following:

- Rent – \$770.00
- Electric – \$500.00
- Car 1 - \$680.00
- Car 2 – 570.00
- Insurance – 575.00
- Internet - \$120.00
- Cell Phone (All three people) – \$550.00
- Storage - \$250.00

When you look at all the core bills they add up to \$4015.00 each month. This only leaves \$385.00 each month after the required bills. This does not include other things that might be needed like food, pet food, gas, and with the court proceedings printer ink, paper, shipping. This is too tight to be able to have my responses bound in the booklets. Hopefully things will change but at today's situation, things are not supporting being able to submit my replies in that manner.

FURTHER INCOME / ASSET INFORMATION

There is no income at this moment from T.G. and G.G. due to health issues at the moment. The only assets are the cars that are listed above that currently have loans on them and are upside down still at this time. The person who is relying on

me or my spouse for support is our child M.G. He has been in a hospital trying to deal with the trauma that was brought on him by CYF in 2024, so he has not been actively needing the monetary support during this difficult time, just the emotional support which we are giving him lots of. The legal residence of this family is in Pennsylvania and T.G.'s age is 47 and G.G.'s age is 45 and we are both high school graduates. There is actively no cash or just minimal waiting to pay a bill, between anyone, since money has been so tight.

CONCLUSION

This respondent requests that this Court should Grant this motion for *In Forma Pauperis* Status for him on this case.

February 24, 2026

/s/ Timothy Green

Timothy Green
3 Parkview Dr.
Clinton, PA 15026
412-722-5843
pro se respondent

No. 25-889

IN THE
SUPREME COURT OF THE UNITED STATES

G.G. — PETITIONER
(Your Name)

VS.

Allegheny County CYF, et al. — RESPONDENT(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):

United States Federal District Court of Western Pennsylvania - will include the order showing this approval. This approval was January 30, 2026 and February 17, 2026

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

Petitioner's affidavit or declaration 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: _____, or

a copy of the order of appointment is appended.

/s/ Timothy Green
(Signature)

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

I, Timothy Green, am the ^{respondent}~~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	\$ 0	\$ 0	\$ 0
Self-employment	\$ 0	\$ 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	\$ 0
Public-assistance (such as welfare)	\$ 0	\$ 0	\$ 0	\$ 0
Other (specify): <u>Richard D.</u>	\$ 4400.00	\$ 4400.00	\$ n/a	\$ n/a
Total monthly income:	\$ 4400.00	\$ 4400.00	\$ 0	\$ 0

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
Uber	California	April 2024 - October 2025	\$ 1500.00
Randy Mitchell Towing	Pittsburgh, PA	November 2021-April 2024	\$ 3000.00
			\$

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	N/A	\$ 0.00
			\$
			\$

4. How much cash do you and your spouse have? \$ 50.00
 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
None	\$ 0.00	\$ 0.00
	\$	\$
	\$	\$

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 N/A
- Motor Vehicle #1
Year, make & model 2021 Chrysler Pacifica
Value under loan - upside down
- Motor Vehicle #2
Year, make & model 2022 Chevy Bolt
Value under loan - upside down
- Other assets
Description None
Value 0.00

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
No one	\$ 0.00	\$ 0.00
_____	\$ _____	\$ _____
_____	\$ _____	\$ _____

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
M.G.	Child - son	16.5
_____	_____	_____
_____	_____	_____
_____	_____	_____

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)	\$ 770.00	\$ 0.00
Are real estate taxes included? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Is property insurance included? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Utilities (electricity, heating fuel, water, sewer, and telephone)	\$ electric -500.00	\$ Cell Phone - 550.00
Home maintenance (repairs and upkeep)	\$ N/A	\$ N/A
Food	\$ 300.00	\$ 0.00
Clothing	\$ 0.00	\$ 0.00
Laundry and dry-cleaning	\$ 0.00	\$ 0.00
Medical and dental expenses	\$ 0.00	\$ 0.00

	You	Your spouse
Transportation (not including motor vehicle payments)	\$ 100.00	\$ 50.00
Recreation, entertainment, newspapers, magazines, etc.	\$ 0.00	\$ 0.00
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	\$ 100.00	\$ 0.00
Life	\$ 0.00	\$ 0.00
Health	\$ 0.00	\$ 0.00
Motor Vehicle	\$ 450.00	\$ 0.00
Other: _____	\$ 0.00	\$ 0.00
Taxes (not deducted from wages or included in mortgage payments)		
(specify): _____	\$ 0.00	\$ 0.00
Installment payments		
Motor Vehicle	\$ 572.00	\$ 680.00
Credit card(s)	\$ 0.00	\$ 0.00
Department store(s)	\$ 0.00	\$ 0.00
Other: _____	\$ 0.00	\$ 0.00
Alimony, maintenance, and support paid to others	\$ 0.00	\$ 0.00
Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$ 0.00	\$ 0.00
Other (specify): <u>Storage, Internet</u>	\$ <u>Storage - 250.00</u>	\$ <u>Internet- 120.00</u>
Total monthly expenses:	\$ 3042.00	\$ 1400.00

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? N/A

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

Not Applicable

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? N/A

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

Not Applicable

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

Further described in the attached motion about the recent struggles, some of which are actually related to this case.

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

Executed on: February 22, 2026

/s/ Timothy Green, pro se respondent
(Signature)

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

GENA GREEN, <i>Biological Mother;</i>)	
TIMOTHY GREEN, <i>Biological Father; and</i>)	
RICHARD DICKMAN, <i>In Loco Parentis,</i>)	Civil Action No. 2:26 CV 123
)	Magistrate Judge Maureen P. Kelly
Plaintiffs,)	
)	
v.)	
)	
ALLEGHENY CYF;)	
CAITLIN MILLER, <i>CYF Supervisor;</i>)	
MALLORY CONTI, <i>CYF Supervisor; and</i>)	
JONAH FISH-GERTZ, <i>Esq.,</i>)	
)	
Defendants.)	

ORDER OF COURT

Gena Green, Timothy Green, and Richard Dickman (“Plaintiffs”) proceeding pro se, have filed a Motion for Leave to Proceed In forma Pauperis (“IFP Motion”), ECF No. 1, in order to prosecute a civil action against four defendants.

Whether to grant or deny the IFP Motion is committed to the sound discretion of the District Court. See Cotto v. Tennis, 369 F. App’x 321, 322 (3d Cir. 2010) (“We review the denial of leave to proceed IFP for abuse of discretion.”). In the sound exercise of our discretion and after reviewing the IFP Motion, we find that the Plaintiff have sufficiently carried their burden to show entitlement to IFP status.

Plaintiffs are informed that the court can later enter an order taxing costs in this case. No one, including Plaintiff, is relieved by this order from the obligation to pay or to reimburse taxable costs after this action is over.

In addition, after a motion to proceed IFP has been granted, the court may dismiss a complaint under 28 U.S.C. § 1915(e)(2)(B) if the court finds that the complaint is frivolous or malicious or fails to state a claim upon which relief can be granted.

Accordingly, it is IT IS ORDERED:

1. That Plaintiffs' IFP Motion, ECF No. 1 is GRANTED.
2. Plaintiffs shall keep the court informed of the plaintiffs' current address at all times while this case is pending.
3. Plaintiffs are advised that they are bound by the Federal Rules of Civil Procedure and by the Local Rules of this court in the prosecution of this case. The federal rules are available at any law library, and the local rules are available at the office of the Clerk of Court, and also on the court's web site at <https://www.pawd.uscourts.gov/sites/pawd/files/lrmanual20181101.pdf>
4. This order is entered without prejudice to the court later entering an order taxing costs in this case. No one, including Plaintiff, is relieved by this order from the obligation to pay or to reimburse taxable costs after this action is over.

BY THE COURT:

/s/ Maureen P. Kelly
MAUREEN P. KELLY
UNITED STATES MAGISTRATE JUDGE

Date: February 17, 2026