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IN THE
SUPREME COURT OF THE UNITED STATES
OCTOBER TERM, 2025

HEATHER NICOLE BYCROFT,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

On Petition for Writ of Certiorari to the
United States Court of Appeals for the Tenth Circuit

MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS

The Petitioner, Heather Nicole Bycroft, by and through her court-appointed counsel, Howard A. Pincus, Assistant Federal Public Defender for the District of Colorado, respectfully requests this Honorable Court for leave to proceed *in forma pauperis* in applying for a Writ of Certiorari. In support of this request, Petitioner states that undersigned counsel was

appointed pursuant to the Criminal Justice Act by the United States Court of Appeals for the Tenth Circuit, and that she is unable to retain counsel and pay for costs attendant to the proceedings before this Honorable Court.

WHEREFORE, the Petitioner, Heather Nicole Bycroft, respectfully requests that she be granted leave to proceed *in forma pauperis*.

Respectfully submitted,

MATTHEW K. BELCHER
Interim Federal Public Defender

/s/ Howard A. Pincus
HOWARD A. PINCUS
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