

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES
October 2026 Term

CHRISTOPHER ERSKINE, a.k.a. Beagle,
Petitioner,

v.

UNITED STATES,
Respondent.

ON PETITION FOR A WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT

MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*

Petitioner Christopher Erskine, by his attorney, Beverly Van Ness, Esq., respectfully moves for leave to proceed *in forma pauperis* in connection with the above-captioned petition for *certiorari*. Petitioner was granted leave to proceed *in forma pauperis* in the United States District Court for the Eastern District of New York, and in the United States Court of Appeals for the Second Circuit. He was represented at trial, sentencing and, initially on direct appeal, by attorneys appointed pursuant to the Criminal Justice Act, 18 U.S.C. § 3006A *et seq.* Ms. Van

Ness was then retained to represent petitioner on direct appeal, using funds provided by petitioner's family members, and her representation continues for purposes of this petition for *certiorari*. Petitioner has been incarcerated since his arrest, and his financial circumstances are unchanged since he was granted leave to proceed *in forma pauperis* in the District Court.

WHEREFORE, it is respectfully requested that Christopher Erskine be granted leave to proceed *in forma pauperis* in these proceedings.

Dated: August 28, 2026

Respectfully submitted,

Beverly Van Ness

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