

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

ISAIAH PINKERTON,
Petitioner

v.

THE STATE OF RHODE ISLAND,
Respondent

MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*

Now comes Isaiah Pinkerton, the petitioner, and pursuant to Supreme Court Rule 39 moves for leave to file the attached petition for a writ of certiorari without prepayment of costs and to proceed *in forma pauperis*.

In support of this motion, Mr. Pinkerton asserts the following:

1. Mr. Pinkerton has been incarcerated at the Adult Correctional Institutions in Cranston, Rhode Island, since 2022, and is currently serving two consecutive life sentences, plus fifty years to be served consecutively, with ten of those years being non-parolable. His first scheduled parole hearing is July 2093.
2. Mr. Pinkerton was represented by the Rhode Island Public Defender's Office during the state court litigation of the criminal charges forming the basis for this petition and during state appellate proceedings.

3. The Rhode Island Public Defender's Office was appointed to represent Mr. Pinkerton below pursuant to R.I.G.L. § 12-15 *et. seq.*
4. Mr. Pinkerton has no assets and no ability to hire an attorney while he is incarcerated and, as he will not have a chance of release until 2093 (when he would be 96 years old), he has no foreseeable path to earning money to pay for counsel.

WHEREFORE, Mr. Pinkerton requests that this Court issue an Order granting him permission to proceed without payment of costs and to proceed *in forma pauperis*.

Respectfully submitted,

ISAIAH PINKERTON

By His Attorneys,

/s/ Camille A. McKenna

Camille A. McKenna

Counsel of Record

Member of Supreme Court Bar

Assistant Public Defender

Appellate Division

Rhode Island Public Defender

160 Pine Street

Providence, RI 02903

401-222-1510 (phone)

401-222-5225 (fax)

cmckenna@ripd.org

/s/ Kara J. Maguire

Kara J. Maguire

Assistant Public Defender

Chief, Appellate Division

Rhode Island Public Defender

160 Pine Street
Providence, RI 02903
401-222-1510 (phone)
401-222-5225 (fax)
kmaguire@ripd.org

Counsel for Petitioner

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