

No. _____

**IN THE
SUPREME COURT OF THE UNITED STATES**

ESTATE OF KATHERINE MONICA VICKERS,

by Rupa Vickers Russe, Executor,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

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

**MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS,
PETITION FOR A WRIT OF CERTIORARI, AND APPENDIX**

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Counsel for Petitioner

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

Estate of Katherine M. Vickers,
Applicant,

v.

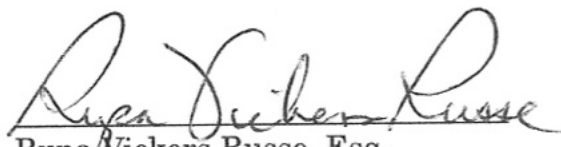
United States of America,
Respondent.

MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS

The petitioner asks leave to file the attached petition for a motion for stay of the issuance of the mandate from the Fourth Circuit 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):
- ☒ 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.


Rupa Wickers Russe, Esq.
Executor, Estate of Katherine M. Vickers

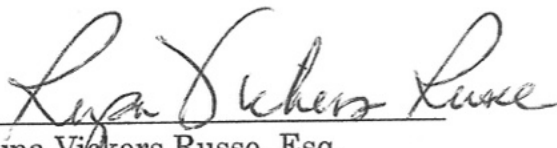
**AFFIDAVIT OR DECLARATION
IN SUPPORT OF MOTION FOR LEAVE TO PROCEED *IN FORMA*
*PAUPERIS***

I, Rupa Vickers Russe, Esq., declare as follows:

1. I am the Executor of the Estate of Katherine M. Vickers who is the petitioner in the above-entitled case. I am proceeding pro bono in this case, and will be submitting my application for admission to this Court forthwith.
2. In support of the Estate's motion to proceed in forma pauperis, I state that the Estate has no assets to its name and due to this poverty, is unable to pay the costs of this case or to give security therefor; and I believe the Estate is entitled to redress.
3. Ms. Vickers' died without any substantive assets.
4. Her real property was co-owned as Joint Tenant with Right of Survivorship at the time of her death, and transferred to the co-owners upon her death.
5. Ms. Vickers' Estate's funeral and debt expenses and disbursements of personal property occurred before the underlying case was commenced.
6. Ms. Vickers' Estate has one bank account open, pending resolution of her pending claims, and its balance is as of July 14, 2026, \$596.70. The Estate is in active litigation in an associated case in the D.C. District Court and anticipates this case being required for expert witness fees in that matter.
7. As of today's date the Estate has debts totalling over \$596.70 in unpaid litigation costs for the costs of the proceedings below.
8. I am attaching this Court's Affidavit or Declaration in Support of Motion for Leave to Proceed In Forma Pauperis form in addition to this affidavit.

I declare under penalty of perjury that the foregoing is true and correct. 28 U.S.C. § 1746.

Executed on: July 15, 2026



Rupa Vickers Russe, Esq.
Executor, Estate of Katherine M. Vickers

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

I, Rupa Vickers Russe, am the Executor of the Estate of Katherine M. Vickers who is the petitioner in the above-entitled case. I am proceeding pro bono in this case, and will be submitting my application for admission to this Court forthwith.

In support of the Estate's motion to proceed in forma pauperis, I state that the Estate has no assets to its name and due to this poverty, is unable to pay the costs of this case or to give security therefor; and I believe the Estate is entitled to redress.

Income source	Average monthly amount during the past 12 months		Amount expected next month	
	You	Spouse	You	Spouse
Employment	\$ <u>N/A</u>	\$ <u>N/A</u>	\$ <u>N/A</u>	\$ <u>N/A</u>
Self-employment	\$ _____	\$ _____	\$ _____	\$ _____
Income from real property (such as rental income)	\$ _____	\$ _____	\$ _____	\$ _____
Interest and dividends	\$ _____	\$ _____	\$ _____	\$ _____
Gifts	\$ _____	\$ _____	\$ _____	\$ _____
Alimony	\$ _____	\$ _____	\$ _____	\$ _____
Child Support	\$ _____	\$ _____	\$ _____	\$ _____
Retirement (such as social security, pensions, annuities, insurance)	\$ _____	\$ _____	\$ _____	\$ _____
Disability (such as social security, insurance payments)	\$ _____	\$ _____	\$ _____	\$ _____
Unemployment payments	\$ _____	\$ _____	\$ _____	\$ _____
Public-assistance (such as welfare)	\$ _____	\$ _____	\$ _____	\$ _____
Other (specify): _____	\$ _____	\$ _____	\$ _____	\$ _____
Total monthly income:	\$ _____	\$ _____	\$ _____	\$ _____

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

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	\$ 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
~~DEBIT~~ DEBITOR'S SAVINGS ACCOUNT	\$ 596.70	\$ N/A
	\$	\$
	\$	\$

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

☐ Home
Value _____

☐ Other real estate
Value _____

☐ Motor Vehicle #1
Year, make & model _____
Value _____

☐ Motor Vehicle #2
Year, make & model _____
Value _____

☐ Other assets
Description _____
Value _____

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

N/A

\$ N/A

\$ N/A

\$ _____

\$ _____

\$ _____

\$ _____

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

N/A

N/A

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)

\$ N/A

\$ N/A

Are real estate taxes included? ☐ Yes ☐ No

Is property insurance included? ☐ Yes ☐ No

Utilities (electricity, heating fuel,
water, sewer, and telephone)

\$ _____

\$ _____

Home maintenance (repairs and upkeep)

\$ _____

\$ _____

Food

\$ _____

\$ _____

Clothing

\$ _____

\$ _____

Laundry and dry-cleaning

\$ _____

\$ _____

Medical and dental expenses

\$ _____

\$ _____

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

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? _____

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

☐ No

If yes, how much? Estimated + \$50,000.00 USD in EXPERT witness and Deposition fees.

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

DR. Henry Friedman, 1808 Faison Rd., Durham, NC 27705, 919-210-2216;

DR. EDWARD YUN, 14271 Jeffrey Rd. #135, Irvine, CA 92620, 949-438-0801;

DR. Farr Ajir, 3448 Whitherever Pl., Westlake Village, CA 91361, 435-654-645

DR. ELLEN Bondar, 500 Westchester Ave., West Harrison, NY 10604, 917-455-8011

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

Ms. Vickers is deceased, and the expenses of the case below has left the estate in significant debt to a number of witnesses and Deposition providers.

I declare under penalty of perjury that the foregoing is true and correct. 28 U.S.C. § 1746.

Executed on: July 15, 2026

Rupa Vickers Russe
Rupa Vickers Russe, Esq.
Executor, Estate of Katherine M. Vickers