No. 26-5956

FILED
OCT 16 2026
OFFICE OF THE CLERK
SUPREME COURT, U.S.

IN THE SUPREME COURT OF THE UNITED STATES

Marina Burroughs - Petitioner, and

Robert Burroughs - Petitioner

Vs.

Texas Department of Family and Protective Services - Respondent

(In The Interest of K.B., a Child)

MOTION FOR LEAVE TO PROCEED IN *FORMA PAUPERIS*

We, the Petitioners, Marina Burroughs (wife) and Robert Burroughs (husband) ask leave to file the attached petition for a writ of certiorari without prepayment of costs and to proceed *in forma pauperis*.

We, the Petitioners, have previously been granted leave to proceed *in forma pauperis* in the following courts: 173rd District Court of Henderson County, Texas and County Court at Law #2, Henderson County, Texas.

Our declaration in support of this motion is attached hereto.

Signature of Petitioner (wife)

Marina Burroughs

Printed Name

Address: 7192 Shallowater Rd, Mabank, TX, 75156

Email: marina.aleksandra.888@gmail.com

Signature of Petitioner (husband)

Robert Burroughs

Printed Name

Telephone: (903) 519 -2249

Email: robertburroughs1st@gmail.com

RECEIVED
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SUPREME COURT, U.S.

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

We, Marina Burroughs and Robert Burroughs, are the petitioners in the above-entitled case. In support of our *Motion For Leave To Proceed In Forma Pauperis,* we state that because of our poverty we are unable to pay the costs of this case or to give security therefore; and we believe we are entitled to redress.

1. Here are the estimated amounts of money we both have received from each of the following sources during the past 12 months. We have adjusted any amounts we have received weekly, biweekly, quarterly, semiannually, or annually to show the monthly rate. We used gross amounts herein before taxes or otherwise:

Income source	**Average monthly amount during the past 12 months**		**Amount expected next month**	
	Marina	Robert	Marina	Robert
Employment	$250	$0	$0	$0
Self-employment	$1609.50	$0	$1609.50	$0
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	$0	$0	$0	$0
Disability	$0	$1478.90	$0	$1478.90
Unemployment	$0	$0	$0	$0

Income source	Average monthly amount during the past 12 months		Amount expected next month	
	Marina	Robert	Marina	Robert
Public Assistance	$0	$0	$0	$0
Other: NONE	$0	$0	$0	$0
Total Monthly Income:	**$1859.50**	**$1478.90**	**$1609.50**	**$1478.90**

2. **Employment History** for the past two years, most recent first. Gross average monthly pay.

Marina Burroughs. One job in the past 2 years. Employer during the last two years was: Soulman's Bar-B-Que, 101 S. 3rd St., Mabank, TX, 75147. Between 01/14/2026 and 03/11/2026 with an average income of $1,500 a month.

3. **Robert Burroughs**. Disabled and has not been employed by anyone in the past two years.

4. **Cash on** hand $26. We have 3 checking accounts:

Marina Burroughs checking Prosperity Bank: $13.54

Marina Burroughs checking Prosperity Bank: $1.01

Robert Burroughs checking Woodforest Bank: $20.16

5. Our homesite value is: $39.535. We had a rental property that was set on fire by an arsonist in 2025. We still have the land with the burned down building on it, the value of that land has depreciated to: $39,000. This was a rental property that at this time is unusable. Our previous car gave up and is worth the cost of metal - $300. We have 2 current vehicles: Chevy 1500, 1993 - $800 and Chevy 1500, 2009 - $3,000.

6. To the best of our knowledge no business or organization owes us any money. (see Note 2)

7. Persons that rely on us:

Name	Relationship	Age

A.B.	Marina Burroughs' daughter	11
A.B.	Marina Burroughs' son	12

8. **Average monthly expenses** are below. Any payments that are paid weekly, biweekly, quarterly or annually are adjusted to show monthly rate:

	Marina	Robert
POA fees	$16.48	$15. 29
Mortgage	$0	$0
Utilities	$0	$533
Home maintenance	$0	$100
Food etc. (see Note 1)	$225.75	$334.41
Clothing	$20	$20
Laundry	$40	$0
Medical and dental	$0	$0
Transportation Registration	$6.25	$6.25
Entertainment	$15.93	$0
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	$0	$0
Life	$0	$0
Health	$0	$202.90
Motor Vehicle	$92	$0
Other: NONE	$0	$0
Taxes (not deducted from wages or included in mortgage payments)		
Property Taxes	$51.07	$27.05

Installment payments		
Motor Vehicle	$0	$0
Credit card(s)	$0	$0
Department Store Card(s)	$0	$0
Other: NONE	$0	$0
Child support to other:	$408.66	$0
Regular Expenses for operating a business, profession or farm, detailed statement is attached after calculation of the total:	$733.36	$0
Internet	$0	$80
Gas	$0	$160
Total monthly expenses:	**$1609.50**	**$1478.90**

Detailed Statement of the Business expenses:

Marina Burroughs. Independent Contractor for Doordash. The majority of the expense is gas money. It is hard to calculate exact expanse with the spending on car maintenance, in this breakdown we only put the spending from the last month which was: $40 to buy the oil and we changed it ourselves; there was a nail in the tire that had to be patched up, that was $15; and the rest was the gas money that only goes on one card, calculated together it came up to $678.36.

Note 1: The food spending, household expenses (paper towels, grooming, etc.) and all the expenses needed to complete legal paperwork are in one lump sum under the Food section. We adjust our spending based on what is more necessary at a given time and what we can do without.

Note 2: The mother of Robert Burroughs' children does owe child support, but she does not live in the same state and has not paid into it. There is a lump sum in a region of $30,000 that we will doubtfully ever see. It has been many years since she left the State of Texas. All the children from that relationship are grown adults.

9. We do not expect any major changes to our monthly income or expenses or in our assets or liabilities during the next 12 months.
10. We have not paid and we will not be paying an attorney any money for services in connection with this case, including the completion of this form.
11. We have not paid and we will not be paying anyone other than an attorney (such as a paralegal or typist) any money for services in connection with this case, including the completion of this form.
12. The reason we can not pay the costs of this case is because we are stretched very thin due to all the legal issues that followed K.B. case. Timothy Bleeker the father of the A.B. and A.B. hired an attorney and set forth child support that is a priority for us to come up with. Most of the money from dashing is going towards child support and the tools needed to complete this and other legal paperwork in an effort to reverse the lower court's decision and bring our children home. We are able to sustain due to the tenacity of our character and combined between us experience. We cook for ourselves, we do all legal paperwork to the best of our ability ourselves, we fix what we know how ourselves and we allocate money acquired based on immediate priorities.

We, Marina Burroughs and Robert Burroughs, declare under penalty of perjury that the foregoing is true and correct. (pursuant to 28 U.S.C. § 1746).

Executed on: October 16, 2026.

Signature of Petitioner (mother)

Signature of Petitioner (father)

Marina Burroughs

Printed Name

Robert Burroughs

Printed Name

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