No. _____

IN THE SUPREME COURT OF THE UNITED STATES

C.H. and S.H., a minor,
Petitioners,

v.

Ch.H.; Joseph J. Reisenman, M.D.; and Allison Strasser Winston, Ph.D.,
Respondents.

On Petition for a Writ of Certiorari to the Superior Court of New Jersey, Appellate Division

MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS

Petitioners C.H. and her minor daughter, S.H., respectfully ask for leave to file the accompanying Petition for a Writ of Certiorari without prepayment of costs and to proceed in forma pauperis. Petitioners did not seek leave to proceed in forma pauperis in the courts below. The declaration of petitioner C.H., made on her own behalf and on behalf of her minor daughter, S.H., in support of this motion is annexed hereto.

Respectfully submitted,

/s/ Michael Confusione
Michael Confusione
Counsel of Record
Hegge & Confusione, LLC
P.O. Box 366
Mullica Hill, New Jersey 08062
(800) 790-1550
mc@heggelaw.com
Counsel for Petitioners

Dated: November 17, 2026

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

I, Carrie Haight, am the petitioner in the above-entitled case. In support of my motion to proceed *in forma pauperis*, I state that because of my poverty I am unable to pay the costs of this case or to give security therefor; and I believe I am entitled to redress.

1. For both you and your spouse estimate the average amount of money received from each of the following sources during the past 12 months. Adjust any amount that was received weekly, biweekly, quarterly, semiannually, or annually to show the monthly rate. Use gross amounts, that is, amounts before any deductions for taxes or otherwise.

Income source	**Average monthly amount during the past 12 months**		**Amount expected next month**	
	You	Spouse	You	Spouse
Employment	$ ~~3,800~~	$ Ø	$ Ø	$ Ø
Self-employment	$ 3,800	$ Ø	$ 3,800	$ Ø
Income from real property (such as rental income)	$ 0	$ Ø	$ 0	$ Ø
Interest and dividends	$ 0	$ Ø	$ 0	$ Ø
Gifts	$ 0	$ Ø	$ 0	$ Ø
Alimony	$ 0	$ Ø	$ 0	$ Ø
Child Support	$ 0	$ Ø	$ 0	$ Ø
Retirement (such as social security, pensions, annuities, insurance)	$ 0	$ Ø	$ 0	$ Ø
Disability (such as social security, insurance payments)	$ 0	$ Ø	$ 0	$ Ø
Unemployment payments	$ 0	$ Ø	$ 0	$ Ø
Public-assistance (such as welfare)	$ 0	$ Ø	$ 0	$ Ø
Other (specify): NA	$ 0	$ Ø	$ 0	$ Ø
Total monthly income:	$ 3,800	$ Ø	$ 3,800	$ Ø

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
Rula – telehealth therapist		9/2025 – Current	$ 3,800
			$
			$

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			$ 0
n/A			$ 0
n/A			$ 0

4. How much cash do you and your spouse have? $ 75.00
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
Savings	$ 91,519.09	$ 0
	$	$ 0
	$	$ 0

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

☐ Home
Value n/A

☐ Other real estate
Value n/A

☐ Motor Vehicle #1
Year, make & model 2025 Hyundia Santa Fe
Value $ 30,000
owe – $15,000

☐ Motor Vehicle #2
Year, make & model n/A
Value

☐ Other assets
Description n/A
Value n/A

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
Nnadilim Okafor (Currently in Court)	$ 105,000	$ N/A
	$	$ N/A
* See Attached	$	$ 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
S.H.	daughter	12

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)	$ 0	$ 0
Are real estate taxes included? ☐ Yes ☐ No Is property insurance included? ☐ Yes ☐ No		
Utilities (electricity, heating fuel, water, sewer, and telephone)	$ 400.00	$ 0
Home maintenance (repairs and upkeep)	$ 0	$ 0
Food	$ 300.00	$ 0
Clothing	$ 100.00	$ 0
Laundry and dry-cleaning	$ 0	$ 0
Medical and dental expenses	$ 1,250	$ 0

	You	Your spouse
Transportation (not including motor vehicle payments)	$ 0	$ 0
Recreation, entertainment, newspapers, magazines, etc.	$ 50	$ 0
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	$ 0	$ 0
Life	$ 0	$ 0
Health	$ 706.82	$ 0
Motor Vehicle	$ 65.53	$ 0
Other: n/A	$ 0	$ 0
Taxes (not deducted from wages or included in mortgage payments)		
(specify): Wage taxes	$ 500.00	$ 0
Installment payments		
Motor Vehicle	$ 400.00	$ 0
Credit card(s)	$ 0	$ 0
Department store(s)	$ 0	$ 0
Other: n/A	$ 0	$ 0
Alimony, maintenance, and support paid to others	$ 0	$ 0
Regular expenses for operation of business, profession, or farm (attach detailed statement)	$ 0	$ 0
Other (specify): See attached as to why I do not seperate personal/ Business expenses.	$ 0	$ 0
Total monthly expenses:	$ 3,772.35	$ 0

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.

See attached – this is addressed in my responses.

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? $5,000 (paid by family member)

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

Michael Confosione - 1-800-790-1550

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? n/A

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

n/A

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

Please see attached

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: November 10, 2026

(Signature)

Explanations for Affidavit or Declaration In Support of Motion For Leave To Proceed In Forma Pauperis

Regarding question number 4:

The $91,519.09 is from the deposit for business assets I sold so I could care for my daughter and get her proper medical attention. This money is all I have, and my daughter's multiple medical conditions can only be treated at limited hospitals in the United States. My daughter is under the care of specialists at Arnold Palmer Children's Hospital in Orlando Florida, requiring us to travel to Florida a minimum of 2-3 times per year. We will be going to see her doctors on November 20, 2026 for follow up appointments and necessary treatment. My daughter and I will be staying for 1-2 months depending on what she requires which entails costs for gas, food, a place to stay which is $2000.00 per month, copays, and other medical expenses and travel expenses.

Our last trip to Arnold Palmer Children's Hospital was in February of 2026 (after a short stay in January of 2026 in which she was thoroughly evaluated and her AMPS diagnosis was confirmed again along with points of Ehlers Danlos Syndrome) which required us to stay until May 2, 2026 for an 8 week intensive outpatient treatment for Amplified Musculoskeletal Pain Syndrome (PT, OT, and CBT), but unfortunately required a stay longer than 8 weeks as the team of doctors found more underlying medical conditions which were the cause of her symptoms in November of 2021 requiring more appointments, and being placed on a heart monitor for 2 weeks when we returned home. The team of doctors reviewed all medical reports from 2021 and 2022 and felt it necessary to address everything, as she is considered a "complex medical case."

I make very little pay now, as a Licensed Mental Health Counselor who does contract telehealth work due to why I felt it unavoidable to sue for the damage caused. I lost 1 business and had to sell the other for much less than the true value because I was prohibited from working or being on site which decreased revenue, as I had already lost a great deal from the Pandemic Shutdowns, which only ended 2 weeks before my daughter became symptomatic of what we now know is AMPS.

I can only work from home, which is a home owned by my parents, which they allow my daughter and I to live in rent free, with myself responsible for utilities. Due to my daughter's multiple medical conditions, she has been advised by medical professionals not to attend school in person as she has a compromised immune system and also loses consciousness, so I cannot leave her alone and I am her sole caretaker.

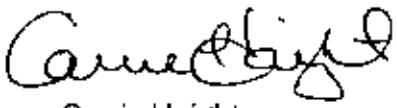
Regarding question number 6:

I sold my business assets from the business I did not lose for only $300,000 with a closing date set for April of 2025. The agreement was that I would be paid $3,000 per month for five and a half years since the deposit of $100,000 was made. Unfortunately, the buyer Nnadilm Okafar moved in, took over and stopped all payments. I could not stop this as I no longer reside in New Jersey. I was forced to hire an attorney in order to enforce the contract in court. This matter has been in court since July of 2025, we have had multiple mediations, and in June of 2026 we met virtually with a court arbitrator and finally the judge. A court order was put into place with us both being sworn in under oath at the Morris County, New Jersey Superior Court with Judge Demarzo. The compromise so I could care for my daughter and resume making payments on my Covid loans was made that Ms. Okafor would pay me $7000 that day, and in July, August, September, October, and November she would make payments of $27,000 per month giving her a $35,000 discount, but again she stopped making payments. Ms. Okafor paid July, and she paid August very late, but we are now still waiting for a court date to be set by Judge Demarzo yet a motion was filed by my attorney in early August of this year. As of me typing this no court date has been set yet, which is causing more financial strain.

Unfortunately, I do not know how much more money will be required of me to be pay legal fees for the business assets, what my daughter may require not covered by insurance or with large payments even after insurance, and I myself have Multiple Sclerosis, which was diagnosed in 2007, which is why I opted to open my own businesses. I do not get any assistance from my child's father as she was a miracle IVF baby which required a donor. I do not know who her biological father is and he is not responsible for paying for my daughters needs.

Due to the legal fees to prove my innocence, inability to work, and other reasons mentioned in my lawsuit I had no choice but to drain my 401k. Unfortunately, before my life was changed by the cause of this lawsuit my businesses were extremely lucrative and I was personally taking home over $400k per year, but my daughter was my priority and I could not lose her for false claims which now have resulted in more financial hardship because I need to be sure she has proper medical care.

Sincerely,



Carrie Haight