

No. 17-193

IN THE SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 2017

JEFFERSON DUNN, COMMISSIONER, ALABAMA
DEPARTMENT OF CORRECTIONS, Petitioner,

v.

VERNON MADISON, Respondent.

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

MOTION TO PROCEED *IN FORMA PAUPERIS*

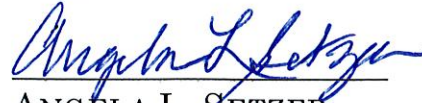
Respondent, Vernon Madison, pursuant to Rule 39 of the Rules of the Supreme Court of the United States, respectfully requests leave to file the attached Brief in Opposition to the Petition for Writ of Certiorari to the Eleventh Circuit Court of Appeals without prepayment of costs and to proceed *in forma pauperis*.

On December 28, 2011, the Eleventh Circuit Court of Appeals appointed undersigned counsel to represent Mr. Madison pursuant to the

Criminal Justice Act, 18 U.S.C. §3006A. See Sup. Ct. R. 39(1). Respondent was declared indigent at his trial in 1994 and proceeded *in forma pauperis* in all prior proceedings in state and federal courts, including this Court. Mr. Madison was granted permission to proceed *in forma pauperis* in appealing the denial of his habeas corpus petition to the Eleventh Circuit Court of Appeals and since that time, he has been allowed to proceed *in forma pauperis* in all filings. See, e.g., Thomas v. Madison, 568 U.S. 1019 (2012) (this Court granted Mr. Madison's motion to proceed *in forma pauperis* and denied State of Alabama's petition for certiorari); (Doc. 17 at 2) (district court order of May 10, 2016, granting Mr. Madison's motion to proceed *in forma pauperis* on appeal to Eleventh Circuit Court of Appeals).

For these reasons, Respondent respectfully requests that this Court again grant him leave to proceed *in forma pauperis* in this Court.

Respectfully submitted,



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September 5, 2017