Alan Morrison

SUPREME COURT
ASSISTANCE PROJECT | 2016–2017

PUBLIC CITIZEN LITIGATION GROUP

"Many thanks for providing invaluable help. Public Citizen was a great resource."

— Email from Cynthia Goodman, thanking us for assistance at the certiorari stage in *Bennallack v. C.V.*

Alan Morrison

SUPREME COURT ASSISTANCE PROJECT | 2016 TERM

This report reviews the work of the Alan Morrison Supreme Court Assistance Project and its fellowship program from July 1, 2016 – June 30, 2017. The Project offers pro bono legal assistance at the certiorari stage, helping to oppose petitions for certiorari to protect public-interest victories in lower courts, and at the merits stage, helping to draft briefs and conducting moot courts in public-interest cases. Your support ensures that the Project can continue to offer this assistance.

The Project fellow identifies the cases in which we offer assistance. The fellow reviews all paid petitions for certiorari filed in the Supreme Court and selects cases concerning issues of public interest that are possibly cert-worthy. For these cases, the fellow prepares a memo analyzing the strength of the petition. Working under the supervision of Public Citizen Litigation Group's director, the fellow then offers assistance to counsel in appropriate cases. When a lawyer accepts the fellow's offer, a Public Citizen attorney assumes principal responsibility, often with the fellow's substantial input. We also consider offering assistance or a moot court for all petitions granted by the Court for review on the merits.

Nicolas Sansone served as the 2016 – 2017 Supreme Court Assistance Project fellow. Last year, donations significantly defrayed the cost of his fellowship. Nick completed his fellowship in early August. Tahir Duckett, a graduate of Georgetown University Law Center, joined us in August as our new fellow.

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THE PROJECT AND THE SUPREME COURT

Our Project began in 1990, when Public Citizen Litigation Group's founder Alan Morrison envisioned a public-interest group that could serve as an equalizer in Supreme Court cases, a counterweight to the expertise of the elite private and government lawyers who specialize in Supreme Court practice and often represent clients opposing consumer and other public interests before the Court. Alan's idea was to mobilize the Litigation Group's Supreme Court experience and expertise in a systematic way to assist lawyers in preventing the Court from taking cases that it should not take and in winning cases that the Court does take. The Supreme Court Assistance Project is the result of his vision.

The Supreme Court Justices have enormous discretion in which cases to accept for certiorari review. Following the February 2016 death of former Justice Antonin Scalia, commentators were quick to note that the eight-member Court appeared reluctant to grant review in cases likely to implicate partisan divides. With the recent and controversial accession of the deeply conservative Justice Neil Gorsuch to the seat left vacant for over a year following Justice Scalia's death, this reluctance appears to have come to an end. For the upcoming 2017 Term, the Court has already agreed to take up such divisive questions as the justiciability of partisan gerrymandering, the legality of President Trump's controversial "travel ban," and the extent to which state antidiscrimination laws can constitutionally bar a baker from refusing to supply a cake for a same-sex wedding.

Given the current composition of the Court, this revived energy in granting certiorari review is not good news. And the present Republican control of the White House and Senate leaves little hope that the Court's current, conservative center of gravity will soon shift. As a result, Public Citizen's pro bono assistance to public-interest litigants seeking to argue against Supreme Court review of favorable lower-court decisions is more critical now than ever.

Public Citizen Litigation Group's ability to offer expert assistance at the certiorari stage is particularly essential given the level of specialization involved in convincing the Court to grant or deny review. A 2016 empirical study published in the *Villanova Law Review* confirms that "repeat players" before the Court hold a considerable advantage at the certiorari stage as a result of their "ability to bear greater costs, focus on gains in the aggregate through repeat litigation, and shift the course of the law over time," as well as their "institutional standing and developed skill in the unique area of bringing cases to the Supreme Court." Many of these "repeat players" regularly represent corporate interests and are either unaffordable for most people or have conflicts of interest that prevent them from representing the public interest on many issues.

Accordingly, Public Citizen has worked diligently to realize the Project's aim of providing experienced Supreme Court representation in public-interest cases. Since the Project's founding, our attorneys have drafted more than one hundred oppositions to petitions for certiorari and advised attorneys on hundreds of additional oppositions, scoring quiet victories by helping attorneys keep their cases out of the Supreme Court. The certiorari process can be daunting even to experienced appellate lawyers. From drafting a brief to providing feedback or answering questions about procedure, we help trial lawyers, public-interest attorneys, and others with little Supreme Court experience navigate the cert-stage process.

Public Citizen attorneys have argued 64 cases before the Supreme Court and served as lead or co-counsel in scores more. Bringing decades of Supreme Court experience, the Project often provides assistance in cases concerning access to the civil justice system or claims of government misconduct, and in cases in which employees, civil rights claimants, or tort plaintiffs have won significant awards or established important precedents.

"Your experience and legal acumen with respect to appearing before the U.S. Supreme Court was greatly appreciated. In these somewhat troubling times, I'm heartened that there is an organization like yours with bright minds that are fighting for everyday citizens."

— Email from Rich Carlson, thanking us for assistance at the certiorari stage in *BNSF Railway Co. v. Noice*

OUR DOCKET: THE 2016 TERM

In the 2016 Supreme Court Term, which ran from October 2016 through June 2017, Public Citizen Litigation Group provided substantial petition-stage assistance in more than twenty cases, serving as the principal drafter of the petition for certiorari or brief in opposition in ten cases. At the merits stage, Public Citizen served as counsel of record in one case and held moot courts in twenty cases. We also submitted petition-stage amicus briefs in three cases and merits-stage amicus briefs in eight cases. For a list of cases on which we are currently working, visit our website, https://www.citizen.org/our-work/litigation/scap.

Over the course of the 2016 Term, we assisted in cases involving a broad array of issues. At the petition stage, we helped to successfully defend lower-court decisions holding that disbursements from a disabled woman's settlement-funded special needs trust did not count toward her income for the purposes of establishing her eligibility for Section 8 housing assistance, and that prison medical officials who provided substandard care for an injured prisoner could be held liable for an Eighth Amendment violation if they acted with deliberate indifference toward the prisoner's medical needs. In *United States Forest Service v. Cottonwood Environmental Law Center*, we defeated a petition filed by the Solicitor General. And in *Bloomingdale's v. Vitolo*—despite seven amicus curiae briefs on the other side—we successfully opposed a petition arguing that a company can force a consumer to waive claims under California's Private Attorneys General Act by including a waiver provision in an arbitration clause.

At the merits stage, we served as counsel of record in a case defending injured railroad workers' right under the Federal Employers' Liability Act to seek relief from railroads in any jurisdiction where the railroad does significant business. We also held moot courts for lawyers arguing a wide range of issues, including whether holding an individual in pretrial detention for seven weeks based on evidence fabricated by the police is a Fourth Amendment violation, whether municipalities suffering diminished property-tax revenue as a result of banks' racially discriminatory lending practices can bring a Fair Housing Act claim against the banks, and whether companies that buy up defaulted debt for pennies on the dollar must comply with the Fair Debt Collection Practices Act's prohibition on false, deceptive, or misleading debt-collection practices.

Below are some examples of our work during the 2016 Term.

PETITION

United States ex rel. Advocates for Basic Legal Equality, Inc. v. U.S. Bank, N.A.

Advocates for Basic Legal Equality, Inc. (ABLE), a nonprofit organization devoted to advocating for the interests of low-income individuals, brought an action against U.S. Bank, N.A., alleging that the Bank made false certifications in violation of the False Claims Act (FCA). Specifically, ABLE alleged that, when submitting insurance claims to the federal government for losses incurred in foreclosing on home loans insured by the Federal Housing Administration (FHA), U.S. Bank falsely certified that it had complied with FHA pre-foreclosure requirements designed to mitigate the government's losses. U.S. Bank sought dismissal of the lawsuit under the FCA's "public disclosure bar," which bars an FCA *qui tam* action if official documents or the news media publicly disclosed "substantially the same allegations or transactions" before the case was filed. The district court dismissed ABLE's case, and the Sixth Circuit affirmed, interpreting the public disclosure bar broadly and holding that an agency report containing an "industrywide" analysis of "foreclosure processing weaknesses" and a subsequent consent order finding that U.S. Bank had "engaged in unsafe or unsound banking practices" sufficiently disclosed the alleged fraud, even though neither document alleged that U.S. Bank (or any bank) had violated or misrepresented compliance with the FHA's special loss-mitigation requirements.

Working with Washington, DC attorneys at Relman, Dane & Colfax PLLC, Toledo, Ohio attorneys Aneel L. Chablani and George A. Thomas of ABLE, and Stanford Law School Professor Pamela Karlan, Scott Nelson and Allison Zieve of Public Citizen drafted a petition for certiorari. The petition argued that the Sixth Circuit has adopted a uniquely expansive interpretation of the public disclosure bar, placing it in conflict with other federal appeals courts. The Court requested the views of the United States as to whether to grant the petition. Following the change in administrations, the government submitted a brief stating that the petition should be denied. On behalf of ABLE, Public Citizen submitted a supplemental brief explaining that the government's analysis provided insufficient reasons for denying review. The Court, however, denied the petition.

BRIEFS IN OPPOSITION

ABM Industries, Inc. v. Castro

ABM, a group of affiliated companies that provide janitorial services, required its employees to use their personal cell phones to carry out their work duties but did not provide reimbursement for the phones' expenses. Two of ABM's California employees filed a class-action lawsuit in California state court, alleging that ABM's failure to reimburse for cell-phone expenses violated California law. After ABM removed the case to federal court under the Class Action Fairness Act (CAFA), the employees amended their complaint to assert a non-class claim under California's Private Attorneys General Act (PAGA). They then successfully moved to remand the case to state court, arguing that the class claims did not seek more than $5 million. ABM again removed the case to federal court, this time arguing that the PAGA claim should be aggregated with the class claims for the purpose of determining whether the CAFA's $5 million requirement was satisfied. The district court again remanded to state court. After the Ninth Circuit denied ABM leave to appeal the remand, ABM filed a petition for Supreme Court review.

Scott Nelson of Public Citizen, working with Oakland, California attorneys R. Hunter Pyle of Sundeen Salinas & Pyle and Todd F. Jackson of Feinberg Jackson Worthman & Wasow LLP, drafted the brief in opposition. The brief argued that the petition failed to demonstrate that there was any disagreement among the lower courts as to the question presented and that the case would be a poor vehicle for addressing the question given its messy procedural history. The petition was denied.

ActiveLAF v. Duhon

Sky Zone, an indoor trampoline park in Louisiana, required its customers to sign an electronic agreement as a condition of using its facilities. Buried among a set of unrelated terms was a provision stating that any claims by the customer against Sky Zone would be resolved through arbitration, not in court, and that the customer would pay a $5,000 penalty for filing a lawsuit in violation of the agreement. These terms did not apply to claims asserted by Sky Zone. After two injured customers filed separate negligence suits against Sky Zone in Louisiana trial courts, Sky Zone sought to enforce the arbitration provision and have the cases dismissed. The cases reached the Louisiana Supreme Court, which held that the arbitration provision was unenforceable. Despite the presumptive enforceability of mutually agreed arbitration agreements under state and federal law, the court held that the provision's obscure placement and inequitable terms meant that the customers who signed the agreement should not be presumed to have agreed to the provision's harsh terms. Sky Zone filed a petition for certiorari in the U.S. Supreme Court, arguing that the lower court's ruling discriminated against arbitration in violation of the Federal Arbitration Act (FAA).

Public Citizen's Nick Sansone drafted the brief in opposition for Lafayette, Louisiana attorney Christopher Castro of Galloway Jefcoat, LLP and Baton Rouge, Louisiana attorney Christopher Lee Whittington of Williamson Fontenot Campbell & Whittington, LLC. The brief argued that the FAA does not bar state courts from invalidating arbitration agreements that violate generally applicable state-law contract principles, and that the Louisiana Supreme Court's ruling was based on precisely such a violation. The Court denied the petition.

BeavEx, Inc. v. Costello

BeavEx, Inc., a courier company, classifies its delivery drivers as independent contractors. Former delivery drivers filed suit on behalf of a class, alleging that the Illinois law on wage deductions requires BeavEx to classify its delivery drivers as employees rather than independent contractors and that BeavEx took deductions from drivers' wages that it could not legally take from employees. BeavEx argued that the Federal Aviation Administration Authorization Act (FAAAA), which provides that states may not enact or enforce laws "related to a price, route, or service of any motor carrier … with respect to the transportation of property," preempts the application of the state law's definition of "employee" to BeavEx's delivery drivers. The district court held that the state-law definition is not preempted, and the Seventh Circuit affirmed, holding that the state-law provision at issue is not related to the price, route, or service of a motor carrier and is therefore not preempted by the FAAAA. BeavEx then sought review in the U.S. Supreme Court.

Public Citizen's Adina Rosenbaum, working with Bradley Manewith and Marc Siegel of Siegel & Dolan Ltd. in Chicago, Illinois, wrote the brief in opposition. The brief explained that the Seventh Circuit's analysis of the Illinois law and its impact on motor carriers' prices, routes, and services was correct, and that the court's determination was not in conflict with the decision of any other court of appeals. The Court requested the views of the United States as to whether to grant the petition, and the government submitted a brief recommending denial. The petition was denied.

Paso Robles Unified School District v. Timothy O.

The Individuals with Disabilities Education Act (IDEA) requires that school officials work together with the parents of a child with a disability to craft an individualized education program (IEP) responsive to the child's specific needs, after assessing the child in all areas of suspected disability. When "Luke" showed early signs of a developmental disorder, his parents met with staff from Paso Robles Unified School District to discuss his entitlement to special education services. Although the report of a local nonprofit developmental services provider that had been working with Luke suggested that Luke had an autism-spectrum disorder, the District dismissed the possibility that Luke was autistic after a cursory, 30-minute observation of Luke at play. The District concluded that Luke suffered only from a language impairment and crafted his IEP accordingly. Because of his faulty IEP, Luke failed to make progress at school. After repeatedly voicing their concerns, Luke's parents at their own expense enrolled Luke in behavioral therapy, where he quickly made notable strides. Luke's parents then brought suit against the District under the IDEA, requesting compensation for their out-of-pocket costs related to the special education services the District had failed to provide, as well as an appropriate IEP going forward. The Ninth Circuit agreed that the District's failure to assess Luke for autism despite being aware of a risk that he was autistic was a procedural violation of the IDEA that had compromised Luke's IEP. The District filed a petition for Supreme Court review, arguing, among other things, that it had not needed to assess Luke for autism because Luke's developmental services provider had already done so.

Public Citizen's Michael Kirkpatrick assisted Torrance, California attorney Marcy J.K. Tiffany of Tiffany Law Group, PC, with the brief opposing Supreme Court review. The brief argued that the petition misrepresented the opinion below, which held as a factual matter that even though the District *could* have relied on the developmental services provider's assessment, it *had* not done so, and that the petition in any event asked the Court to review case-specific factual matters rather than the sort of generally applicable legal questions the Court prioritizes. The Court denied review.

"Thank you again for [editing a draft brief]. It really was a brilliant job, particularly in light of the turn-around time. You guys are truly amazing!"

— Email from Marcy Tiffany, thanking us for assistance at the certiorari stage in *Paso Robles Unified School District v. Timothy O.*

MOOT COURTS

Moot courts give counsel a valuable opportunity to sharpen their arguments and identify potential vulnerabilities so that they can effectively address the concerns of the Justices. This Term, we hosted moot courts for attorneys with oral arguments before the Court in twenty cases—nearly one-third of the sixty-four cases argued. We mooted both attorneys preparing for their first Supreme Court arguments and attorneys with significant Supreme Court experience.

The cases involved a wide range of public-interest issues. The cases were:

Advocate Health Care Network v. Stapleton (whether an employee benefits plan maintained by a non-church organization associated with or controlled by a church is exempt from the requirements of ERISA under the "church plan" exemption)

Bank of America Corp. v. City of Miami; *Wells Fargo & Co. v. City of Miami* (whether a city can sue under the Fair Housing Act for diminished property-tax revenue caused by a defendant bank's use of racially discriminatory lending practices in the city)

BNSF Railway Co. v. Tyrrell (whether a state court may constitutionally exercise personal jurisdiction over a railroad on a Federal Employers' Liability Act claim arising outside the state)

Bristol-Myers Squibb Co. v. Superior Court of California (whether a state court may constitutionally exercise personal jurisdiction over an out-of-state corporation to adjudicate nonresidents' claims identical to those being asserted by in-state residents)

California Public Employees' Retirement System v. ANZ Securities, Inc. (whether the timely filing of a class-action

MOOT COURTS (CONTINUED)

lawsuit tolls the three-year statute of repose in section 13 of the Securities Act of 1933 for individual class members who later opt out of the class)

County of Los Angeles v. Mendez (whether residents shot by police who unlawfully entered their home may recover on a Fourth Amendment claim, where the shooting was provoked by the officer's incorrect belief that one resident was holding a gun)

Coventry Health Care of Missouri, Inc. v. Nevils (whether the Federal Employees Health Benefits Act preempts state laws that prohibit insurers from seeking compensation from an injured beneficiary who successfully recovers medical expenses from a third party)

Czyzewski v. Jevic Holding Corp. (whether a bankruptcy court may approve a structured dismissal of a Chapter 11 bankruptcy case that distributes the debtor's assets in a manner inconsistent with the Bankruptcy Code's priority rules)

Endrew F. v. Douglas County School District (whether a school district violates the Individuals with Disabilities Education Act by providing a student with an individualized education program calculated to afford the student progress that is merely more than *de minimis*)

Expressions Hair Design v. Schneiderman (whether a state law that prohibits a merchant from imposing a surcharge on credit-card payments but not from offering a discount on cash payments regulates speech)

Fry v. Napoleon Community Schools (whether a disabled student seeking relief under federal antidiscrimination law that is not available under the Individuals with Disabilities Education Act must exhaust administrative remedies before filing suit)

Henson v. Santander Consumer USA, Inc. (whether a company that purchases and attempts to collect defaulted debt is a "debt collector" subject to the Fair Debt Collection Practices Act)

Hernández v. Mesa (whether an unarmed Mexican citizen standing in Mexico when he was shot by a U.S. border agent standing on U.S. soil may assert a Fourth Amendment excessive force claim against the agent)

Kindred Nursing Centers Limited Partnership v. Clark (whether the Federal Arbitration Act preempts a state-law rule that reads a power-of-attorney document not to confer authority to enter an arbitration agreement unless the document does so expressly)

Manuel v. City of Joliet (whether a criminal suspect indicted and held pretrial on the basis of fabricated evidence may seek relief under the Fourth Amendment for his post-indictment detention)

Microsoft Corp. v. Baker (whether a federal appeals court may review the denial of a motion for class certification after the plaintiffs voluntarily dismissed the suit)

Midland Funding, LLC v. Johnson (whether knowingly filing a claim for a time-barred debt in bankruptcy proceedings is an unfair or deceptive debt collection practice under the Fair Debt Collection Practices Act)

Moore v. Texas (whether the Eighth Amendment bars a state court from relying on outdated medical standards to determine whether a criminal defendant is intellectually disabled and therefore ineligible for capital punishment)

Nelson v. Colorado (whether a state can require a criminal defendant whose conviction has been overturned to demonstrate his innocence by clear and convincing evidence to receive reimbursement of monetary penalties imposed as a result of the conviction)

State Farm v. United States ex rel. Rigsby (whether a False Claims Act relator's technical violation of the Act's requirement that a complaint be kept under seal for at least 60 days requires dismissal of the case)

"You got all the hard questions thrown at you [during oral argument]. Importantly, you did great in your answers. On behalf of my firm and client, thank you for all your hard work."

— Email from Fred Bremseth, co-counsel in *BNSF Railway Co. v. Tyrrell*

2016 TERM: DEFENDING ACCESS TO THE CIVIL JUSTICE SYSTEM

For an individual harmed by wrongdoing, having a valid legal claim is only the first prerequisite to obtaining redress. The individual must also be able as a practical matter to pursue the claim before a tribunal that is accessible and impartial. Powerful corporate defendants, however, have been fighting to force litigation into venues that are inconvenient for plaintiffs or favorably disposed toward corporate interests. The Supreme Court's recent jurisprudence in the areas of personal jurisdiction and binding arbitration has rewarded these efforts. This Term, Public Citizen Litigation Group fought vigorously against corporations' efforts to force plaintiffs into remote and unfriendly forums as they seek to vindicate their legal rights.

Most notably, Public Citizen took the lead in *BNSF Railway Co. v. Tyrrell,* briefing and arguing the case before the Court this Term on behalf of injured railroad workers seeking compensation under the Federal Employers' Liability Act. The workers had brought suit in a Montana court near their home states, but the defendant, BNSF Railway, argued that under constitutional principles of personal jurisdiction the workers could only assert their claims in BNSF's place of incorporation (Delaware) or principal place of business (Texas), or in the states where the workers had suffered their injuries. Although it employed over 2,000 people in Montana, held over 2,000 miles of permanent track in Montana, regularly lobbied the Montana legislature, and turned $1.7 billion in Montana revenues in 2013 alone, BNSF argued that requiring it to defend itself in Montana violated its due process rights. A majority of the Supreme Court, however, was unmoved, doubling down on its recent jurisprudence substantially limiting where a multistate corporation may be subject to personal jurisdiction. Now, it is up to a future Congress to amend FELA to restore workers' right to access courts in a convenient state.

Although the Supreme Court has recognized that a plaintiff may generally bring suit in the jurisdiction where the defendant's conduct gives rise to the plaintiff's injury, corporate defendants have sought to narrow even this well-established route to personal jurisdiction. In *MoneyMutual LLC v. Rilley*, MoneyMutual, a Nevada-based company that connected consumers with predatory payday lenders, submitted a petition for certiorari arguing that the U.S. Supreme Court should reverse the Minnesota Supreme Court's ruling that MoneyMutual was subject to personal jurisdiction in Minnesota with respect to the claims of Minnesota consumers whom MoneyMutual had lured into unlawful loan agreements. Despite sending over 1,000 emails to match known Minnesota residents with predatory lenders and buying online advertising "specifically designed and calibrated to target potential Minnesota customers," MoneyMutual argued that its case-related conduct was insufficiently connected with Minnesota to support Minnesota's exercise of personal jurisdiction. Public Citizen attorneys prepared a successful brief in opposition, and the Supreme Court denied review, allowing the state court's opinion to remain standing. MoneyMutual's petition, however, was representative of recent petitions filed by corporate defendants attempting to convince the Court to increase the extent of injury-related conduct that must link a multistate corporation to any given state before that state can take jurisdiction over its own citizens' claims against the corporation.

Personal jurisdiction is not the only tool corporate defendants have used to funnel litigation into their preferred forums. As the *New York Times* recognized in an October 2015 article, "Arbitration Everywhere, Stacking the Deck of Justice," corporations are frequently using binding arbitration clauses in consumer contracts to opt out of the justice system entirely and to instead have cases heard by business-friendly arbitrators who are not bound by legal precedent and whose opinions are generally not subject to appeal or judicial review. Citing the Federal Arbitration Act, which announces a federal policy in favor of arbitration, the Supreme Court regularly upholds these clauses, even where state courts have ruled them to be unenforceable under state contract law. For example, this Term, in *Kindred Nursing Centers Ltd. Partnership v. Clark*, in which Public Citizen filed an amicus brief, the Court invalidated an application of state law that would have held an arbitration agreement entered into by an attorney-in-fact on behalf of a principal unenforceable unless the power-of-attorney document conferring the general authority to contract upon the attorney-in-fact expressly conferred authority to enter into an arbitration agreement in particular.

The outcome in *Kindred* shows the importance of keeping public-interest victories out of the Court. We had success in doing so this Term in several cases involving arbitration issues, including *ActiveLAF, LLC v. Duhon*, *Bloomingdale's v. Vitolo*, *H&R Block v. Lopez*, and *Initiative Legal Group v. Maxon*. (And we have already filed another opposition on this issue, in *Bryant v. King*, which the Court will consider in the fall.)

In these and other cases during the 2016 Term, the Supreme Court Assistance Project focused on upholding individuals' ability to vindicate their legal rights by ensuring meaningful access to the civil justice system. As defendants continue to develop new arguments to try to limit individuals' access to courts, our Project will likewise continue working to provide expert, pro bono representation to individuals and others pursuing their rights in cases of public interest.

Your contribution is vital to our continued success.

In its twenty-seven years, the Supreme Court Assistance Project has assisted hundreds of lawyers in opposing (and in some cases filing) petitions for certiorari, in briefing the merits of cases after the Supreme Court grants review, and in preparing for Supreme Court arguments. The Project provides pro bono support and counsel from lawyers who have knowledge of Supreme Court practice equal to that of the high-priced experts often aligned against public-interest attorneys.

We look forward to continuing our efforts for many years, but we need your help. Although we operate on a shoestring, providing the assistance that we offer requires financial support.

You may donate by sending a check in the enclosed envelope or via credit card at https://secure.citizen.org/scap.

Thank you for supporting the Alan Morrison Supreme Court Assistance Project.

Alan Morrison **SUPREME COURT ASSISTANCE PROJECT**

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