

**UNITED STATES COURT OF APPEALS  
FOR THE SEVENTH CIRCUIT**

SIMON BERNSTEIN IRREVOCABLE )  
INSURANCE TRUST DTD. 6/21/95, )  
et al., ) Appellate Case No: 17-3595  
Plaintiffs-Appellees, )  
V. ) LC No. 1:13-CV-O3643  
HERITAGE UNION LIFE )  
INSURANCE CO., et al., )  
Defendants-Appellees. )  
)  
APPEAL OF: )  
ELIOT BERNSTEIN, )  
Cross and Counter-Claimant- )  
Appellant. )

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**Motion to File In Forma Pauperis and Request for Pro Bono Counsel**

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ELIOT IVAN BERNSTEIN, Pro Se, hereby submits this APPLICATION IN FORMA PAUPERIS, sworn under oath to show that BERNSTEIN'S family of 5's income is less than the federal poverty guidelines of \$29,420 <https://aspe.hhs.gov/poverty-guidelines> . Supporting income information is attached filed with the District Court application for In Forma Pauperis and Pro Bono Counsel as Exhibit 1. As a matter of law, MR. BERNSTEIN is indigent and qualifies for pro bono assistance and fee waivers in this case. Moreover, BERNSTEIN cannot physically represent himself with serious health problems he

has endured for over 4 years, causing him to lose consciousness from Vasovagal Syncope, resulting in severe falls, contusions to the head with bleeding on the brain, broken bones and facial reconstruction/dental problems (all requiring high levels of narcotic analgesics, muscle relaxers and a myriad of other prescription drugs) as well as having high blood pressure approaching 200/100. All medical documentation is in the court's record if any further documentation is necessary for this Court's review Mr. Bernstein will provide whatever is necessary. He is under the care of medical professionals and the medications he takes for pain and high blood pressure render him unable to sit or stand for long periods of time and unable to work consistently for 4 years. BERNSTEIN respectfully prays that this Honorable Court grant the relief requested.

DATED: March 02, 2018

Respectfully submitted,

**/s/ Eliot Ivan Bernstein**

Cross and Counter-Plaintiff, Appellant  
PRO SE

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**CERTIFICATE OF SERVICE**

Eliot Ivan Bernstein, Pro Se certifies that he filed a "Motion to Accept Late Filing of Docketing Statement and Motion to File Electronically" via Postal Mail

with the Clerk of the 7th Circuit Court of Appeals, and served copies of same upon those listed below by Postal Mail or email on this 2nd day of March, 2018.

**/s/ Eliot Ivan Bernstein**

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