

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

FILED

MICHAEL BRAHAM,
Petitioner

2003 DEC 11 PM 2:37
DOCKET NO. 3:02CV2153(JBA)

v.

HECTOR RODRIGUEZ,
Respondent

DATE. December 9, 2003

MOTION FOR APPOINTMENT OF COUNSEL

Petitioner Michael Braham, pursuant to § 1915(d), requests this court to appoint counsel to represent him in this case for the following reasons:

1. The petitioner is unable to afford counsel.
2. The claims presented are meritorious and supported by the record.
3. The issues involved in this case are complex.
4. The petitioner is incarcerated, having extremely limited access to legal materials, which are outdated and useless.
5. The petitioner has a limited knowledge and understanding of the law.
6. Appointment of counsel will serve justice and benefit this court by eliminating complications and inconveniences courts suffer when pro se prisoners attempt to litigate with limited resources and legal knowledge.

WHEREFORE, it is respectfully requested that this motion be granted.

"ORAL ARGUMENT NOT REQUESTED"

Respectfully Submitted,

MICHAEL BRAHAM/PETITIONER

BY Michael Braham
Michael Braham#231451
Cheshire Corr. Inst.
900 Highland Avenue
Cheshire, CT. 06410

CERTIFICATION

I hereby certify that a copy of the foregoing has been mailed to:
Carolyn K. Longstreth, Senior Assistant State's Attorney, Civil Litigation
Bureau, Office of the Chief State's Attorney, 300 Corporate Place, Rocky Hill,
CT., 06067, on this 9th day of December, 2003.

Michael Braham
MICHAEL BRAHAM PRO SE