

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

United States District Court  
District of Connecticut  
FILED AT BRIDGEPORT

December 11 2003  
Kevin F. Howe, Clerk  
Deputy Clerk

DOCKET NO. 3:02CV2153 (JBA)

MICHAEL BRAHAM,  
Petitioner

v.

HECTOR RODRIGUEZ  
Respondent

DATE: December 9, 2003

State of Connecticut  
County of New Haven  
ss: Cheshire

DECLARARTION IN SUPPORT OF PETITIONER'S MOTION FOR APPOINTMENT OF COUNSEL

MICHAEL BRAHAM States:

1. I am the petitioner in the above-entitled case. I make this declaration in support of my motion for appointment of counsel.
2. This is a Writ of Habeas Corpus pursuant to 28 U.S.C. §2254 by person in state custody.
3. The claims presented are ineffective assistance of counsel, and Constitutional violations of due process.
4. I am unable to afford counsel.
5. The issues and legal principles in this case are complex.
6. I have limited knowledge of the law.
7. The prison does not have a law library.
8. The legal materials available are severely outdated, the most recent Shephard Citations available is from 1994 and federal caselaw is nonexistent.
9. I am unable to conduct meaningful research or prepare pleadings that would be persuasive.
10. The claims presented have merit and are supported by the record.

WHEREFORE, the petitioner's motion for appointment of counsel should be granted. Pursuant to 28 U.S.C. §1746, I declare under penalty of purjury that the foregoing is true and correct.

Respectfully Submitted,

BY Michael Braham  
MICHAEL BRAHAM  
DATE 12/9/03

CERTIFICATION

I hereby certify that a copy of the foregoing wa 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 9<sup>th</sup> day of December, 2003.

Michael Braham  
MICHAEL BRAHAM PRO SE