

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Shekeira Williams, et al.,

Plaintiffs,

Civil Action
No. 13-10083-FDS

v.

Luis S. Spencer, et al.,

Defendants.

MOTION FOR THE APPOINTMENT OF COUNSEL

Now comes the Plaintiff in the above-civil action moves this Honorable Court for the appointment of counsel. In support of this motion, the Plaintiff states:

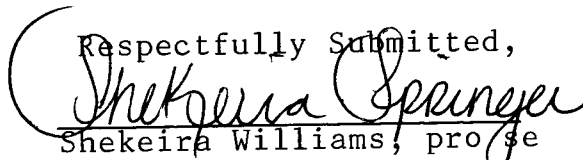
1. Her and her husband, Donald Williams are unable to prosecute this civil action without the appointment of counsel.
2. The Plaintiffs had the help of a jailhouse lawyer, Tony Gaskins, at SBCC to put this civil action together for them, and to help them litigate this matter before the court. However, he is experiencing difficulties in getting legal documentations mailed to me. Mr. Gaskins had put together discovery motions for me and my husband to file and the mail he sent to me never arrived. He mailed four envelopes to me through the prison mail and it has been over three weeks and the plaintiffs received nothing. See Affidavit of Tony B. Gaskins, attached as Exhibit A.
3. The issues in this matter are complex and the plaintiffs are not equipped to litigate this matter on their own

although the issues are meritorious. See Torres v. \$36,256. 80 United States Currency, 25 F.3d 1154 (2nd Cir. 1994)(court ordered the appointment of pro bono counsel based on the presence of complex issues of law).

4. This is also the "third" motion for the appointment of counsel put together for the plaintiffs because the first two Mr. Gaskins put together for them never was mailed out by the prison administration at Souza Baranowski Correctional Center. See Exhibit B.

WHEREFORE, the plaintiffs pray that this motion is allowed.

Respectfully Submitted,

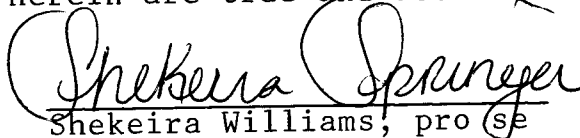


Shekeira Williams, pro se
16 Stockton Street
Dorchester, Ma. 02124

Dated:

VERIFICATION

I, Shekeira Williams, verify under the penalties of perjury that the facts stated herein are true and accurate.

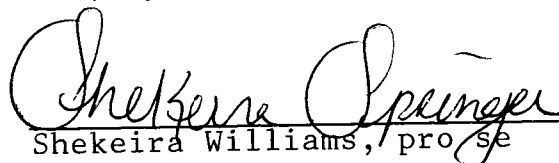


Shekeira Williams, pro se

Dated:

CERTIFICATE OF SERVICE

I, Shekeira Williams, certify that I caused a true copy of the foregoing to be served upon, C. Raye Poole, Esq., Department of Correction, Legal Division, 70 Franklin Street, Suite 600, Boston, Ma. 02110-1327, by first class mail, postage prepaid.



Shekeira Williams, pro se

Dated: