

JUDGE'S COPY

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- Court copy -

IN THE UNITED STATES District Court, For THE Middle District
OF PENNSYLVANIA...

JEFFERY PAUL MOSER

vs.

KENNETH KYLER ET ALII

CIVIL NO# 1100 - CV - 1846

- JURY TRIAL DEMANDED -

- JUDGE: WILLIAM W. CALDWELL

FILED
HARRISBURG, PA
MAY 31 2001

MARY E. D'ANDREA, CLERK
Per _____

Motion For RE-consideration of Plaintiff
"Motion For Appointment of Counsel"

WHEREFORE I, JEFFERY PAUL MOSER (Plaintiff) ASK THE HONORABLE COURT TO RE-CONSIDER MOSER REQUEST FOR COUNSEL AND APPOINT COUNSEL AT THIS TIME.

A.) THE HONORABLE COURT STATED THAT MOSER DID NOT CONTACT ATTORNEYS ON HIS OWN. THIS IS NOT TRUE; PLEASE SEE THE ATTACHED EXHIBITS, IT IS CLEAR MOSER HAS AND CONTINUES TO ATTEMPT TO GET REPRESENTATION ON HIS OWN, BUT HAS NOT SUCCEEDED, AND NOW BEG'S THE HONORABLE COURT FOR COUNSEL. MOSER HAS MORE DOCUMENTATION OF THIS, BUT IS UNABLE TO AFFORD COPIES AND POSTAGE TO MAKE SERVICE ON THE COURT, AND THE PRISON REFUSES TO ASSIST IN ANY MANNER. ALL MOSER COULD AFFORD IS ENCLOSED.

B.) MOSER IS DISABLED, AND RECENTLY HAD A NEW (M.R.E.) DONE AT HUNTINGDON, WHICH STATES HIS CONDITION HAS EXTREMELY WORSE, SINCE THE LAST ONE ENTER WITH THE COMPLAINT. THUS MOSER NEEDS ASSISTANCE OF COUNSEL TO (AMEND COMPLAINT & DISCOVER [redacted] imitations) AS HE IS MEDICALLY INCAPABLE OF LITIGATING BY HIMSELF.

C.) MOSER IS IN FACT, BEING RETALIATED AGAINST BY STAFF AS A RESULT OF THIS ACTION, (C.O.F. MILLER, C.O.F. HECK, ETC.) AND ALSO CAN NOT GET FULL SERVICE THROUGH THE MARSHALL SERVICE AND BELIEVES SUCH RELIEF IS NEEDED. PLEASE GRANT COUNSEL AT THIS TIME.

(Proof of Service) I HEREBY SWEAR UNDER THE PENALTY OF PERJURY THAT I J.P. MOSER MADE SERVICE UPON THE COURT AND DEFENDANTS AS COPIES PROVIDED OF THIS DOCUMENT. All Moser's copy Court copy