

Court Original

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IN THE UNITED STATES District Court for THE MIDDLE District of PENNSYLVANIA...		FILED
JEFFERY PAUL MOSER	vs.	MAY 31 2001
KENNETH KYLER ET AL		CIVIL NO. 1:00-CV-01846
HARRISBURG, PA.	DEPUTY CLERK	JUDGE: William Caldwell

* PLAINTIFF REQUEST COURTS PERMISSION TO FILE A "TRAVERSE", *
 UNDER RULE (8) OF FED. R. CIV. P., TO CORRECTIONS DEFENDANT(S)
 RESPONSE TO PLAINTIFF "MOTION TO RECONSIDER APPOINTMENT OF COUNSEL".

WHEREFORE I, JEFFERY MOSER (PLAINTIFF) "REQUEST PERMISSION FROM THE HONORABLE COURT" TO FILE A "TRAVERSE" IN RESPONSE TO CORRECTIONS COUNSEL RESPONSE IN THE ABOVE MENTIONED MATTER (SHAWN P. KENNY ESQ./CORRECTIONS COUNSEL) ("FOR REASON OF SPECIAL CIRCUMSTANCES") AS FOLLOWS:

1.) PLAINTIFF BELIEVES IN THE CORRECTIONS COUNSEL PIGHT TO HAVE THIS ACTION "DISMISSED", COUNSEL (MR. KENNY) HAS BEEN "LESS THEN" TOTALLY HONEST IN HIS FILING WITH THE HONORABLE COURT AND/OR AT MINIMAL VERY MANIPULATIVE IN NOT TELLING THE "WHOLE TRUTH" ON SEVERAL ISSUES.

BUT MOST RECENT ESQ. KENNY STATED IN THE ABOVE MENTION DOCUMENT "MOSER IS RECEIVING TREATMENT HE JUST DOESN'T LIKE IT" TRYING TO EMPLOY TO THE HONORABLE COURT, THIS IS THE CASE (TRUTH) PRESENT AND ALWAYS HAS BEEN THE CASE (TRUTH). PLAINTIFF WILL NOT GO FURTHER INTO THIS NOW, AS THE COURT MUST GRANT PERMISSION, BEFORE PLAINTIFF IS PERMITTED TO SO.

2.) PLAINTIFF, BELIEVES THIS INFORMATION TO BE LEADINGLY "FALSE AND NOT TRUE"...

3.) PLAINTIFF, BELIEVES IT WOULD BE A "MISCARRIAGE OF JUSTICE" FOR THE HONORABLE COURT TO ACT ON AND/OR DISMISS THE PLAINTIFF ACTION "WITHOUT LOOKING AT THE WHOLE PICTURE (OR) ON THE BASES OF INFORMATION THAT MAY BE "FALSE" IN PART AND/OR IN WHOLE.

4.) THE PLAINTIFF HAS REVEREED THE FACTS AND BELIEVES HE CAN SHOW THE HONORABLE COURT THE "FALSEHOD" OF ESQ. KENNY, STATEMENT(S).

5.) PLAINTIFF, REQUEST ENJOINCTIVE PROTECTIONS FROM D.O.C. DEFENDANT(S) AND COUNSEL FROM "RETALIATION" OF THIS FILING! * PLAINTIFF RESPECTFULLY REQUEST PERMISSION TO FILE A "TRAVERSE" (RESPECTFULLY SUBMITTED)

(SWORN TO: 28 U.S.C. 1746)

Jeffery Moser 5/28/01

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MOSEY
vs.
KYLE

CIVIL NO. 1:00 - EV - 1846

RE: PLAINTIFF REQUEST PERMISSION TO FILE A
"TRAVERSE"

* CERTIFICATE OF SERVICE *

I, JEFFERY MOSEY, (PLAINTIFF) HEREBY CERTIFY THAT I HAVE
ON THIS 28TH DAY OF MAY, 2001, SERVED A COPY OF THE BELOW-
REFERENCED DOCUMENT(S) UPON THE PERSON AND IN THE MANNER
INDICATED BELOW: (PLACED IN THE U.S. MAIL BOX A S.C.E. HUNNINGDON)

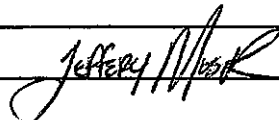
SERVICE BY FIRST CLASS MAIL AS FOLLOWS:

1.) SHAWN P. KENNY Esq.
OFFICE OF CHIEF COUNSEL
PA. DEPT. OF CORRECTIONS (E.D. NO# 1619(1) POSTAGE 10)
55 UTLEY DRIVE
CAMPHILL, PA. 17011

2.) Peter Welsh (Clerk)
U.S. District Court
228 Walnut St. (1619(2))
P.O. Box 983
Harrisburg, Pa. 17108

3.) James D. Young Esq.
P.O. Box 1245 (1097(3))
Harrisburg, PA 17108-1245
(mailed later after copies were provided)

Respectfully Submitted,



ON THIS 28TH DAY OF MAY, 2001

JEFFERY PAUL MOSEY BE4713
1100 PIKE ST
HUNNINGDON, PA. 16654-1112