

1 common to most prisoners, such as lack of legal education and limited law library access, do not
2 establish exceptional circumstances that would warrant a request for voluntary assistance of
3 counsel.

4 Other than plaintiff's assertion that he is unable to do legal work due to prison
5 reconfiguration related to the pandemic, this particular request for the appointment of counsel
6 provides no information that is substantively any different from plaintiff's most recently filed
7 motions, which were denied.

8 Accordingly, IT IS HEREBY ORDERED that plaintiff's motion for the appointment of
9 counsel, filed June 17, 2020 (ECF No. 226), is DENIED.

10 DATED: June 22, 2020

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12 ALLISON CLAIRE
13 UNITED STATES MAGISTRATE JUDGE
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