




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. In the present case, the court does not find the required exceptional circumstances.

4 Accordingly, IT IS HEREBY ORDERED that plaintiff's October 24, 2016 motion for the  
5 appointment of counsel (ECF No. 39) is denied.

6 Dated: November 9, 2016

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9 DEBORAH BARNES  
10 UNITED STATES MAGISTRATE JUDGE  
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