

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

3 Having considered the factors under Palmer, the court finds that plaintiff has failed to
4 meet his burden of demonstrating exceptional circumstances warranting the appointment of
5 counsel at this time.

6 Good cause appearing, IT IS HEREBY ORDERED that plaintiff's request for the
7 appointment of counsel (ECF No. 32) is denied.

8 Dated: August 21, 2017



CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE

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