




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 motion for the appointment of  
5 counsel (ECF No. 13) is denied.

6 DATED: November 22, 2017

7   
8 

---

ALLISON CLAIRE  
9 UNITED STATES MAGISTRATE JUDGE  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28