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CLERK, U.S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA, FLORIDA

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

DENNIS HUNT,

Plaintiff,

Case No. 8:07-cv-1168-T-30TBM

vs.

LAW LIBRARY BOARD,
a Board created by
Hillsborough County, Florida;

NORMA J. WISE,
In her official capacity as Director
of the James J. Lunsford Law Library,
and individually; and,

DAVID L. PILVER,
individually,

Defendants.

_____ /

PLAINTIFF PRO-SE APPEARANCE

AND

MOTION FOR 30-DAY STAY

OF PROCEEDINGS AND TOLL OF RESPONSES

TO DEFENDANT MOTIONS FOR SUMMARY JUDGEMENT

COMES NOW Dennis Hunt, the Plaintiff in this cause of action, appearing PRO-SE, and filing this MOTION FOR 30-DAY STAY OF PROCEEDINGS AND TOLL OF RESPONSES TO DEFENDANT MOTIONS FOR SUMMARY JUDGEMENT, and as grounds and in support therefore states as follows:

1. The Court rendered an Order Granting plaintiff's attorney Ryan Christopher Rodems, Esq., and the law firm of Barker, Rodems & Cook, P.A. their Motion to Withdraw as Attorneys of Record and Motion to Stay Proceedings and Toll Response to Defendants' Motion for Summary Judgment (Dkt 33) on February 11, 2009.

2. The Plaintiff incurred serious illnesses during the time periods of his attorney's withdrawal and the past 30-day stay for Plaintiff to obtain replacement of counsel.

3. Plaintiff was mostly bedridden for the first half of the past 30-day stay, and in severe pain for the last half of the past 30-day stay, limiting his daily activity functioning.

4. Although seriously ill, Plaintiff sought the replacement of his legal counsel throughout the past 30-day stay, but no attorney expressed any interest in the taking on Plaintiff's cause on a contingency fee arraignment.

5. Plaintiff is a qualified individual with disabilities, and is disabled pursuant to U.S. Social Security Administration disability determination. The Court should acknowledge the Plaintiff's disability status, and take into consideration the Plaintiff's status of being a disabled person, in the court's making of decisions.

6. The Court Granting of withdrawal of Plaintiff's attorney, causes the Plaintiff to be highly prejudiced, and seriously encumbers the Plaintiff, in proceeding in timely fashion.

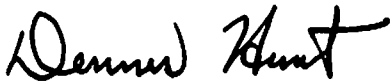
7. Plaintiff regularly requires more time to complete tasks, than is normally expected of non-disabled individuals.

8. Plaintiff requires the 30-Day Stay and Toll of Responses to retrieve his case materials, evidence and records in the custody of past counsel, setup and organize a case file, review all court filings of Plaintiff's past counsel and those of the attorney for Defendants, research relevant case law and develop his responses.

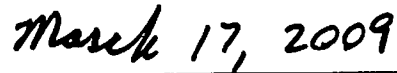
9. Plaintiff contends that if given ongoing reasonable accommodations, such as the Court Granting of additional time for Plaintiff to complete tasks, that the Plaintiff will be able to bring his cause to be decided on the merits of the case, as opposed to being dismissed for procedural error or untimeliness.

Wherefore all of the above, the Plaintiff prays for this Honorable Court to Grant Plaintiff a 30-Day Stay of Proceedings and Toll of Responses to Defendant Motions for Summary Judgement.

Respectfully submitted,



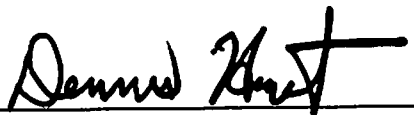
DENNIS HUNT
2319 Nantucket Drive
Sun City Center, FL 33573
Tel: (813) 436-9915



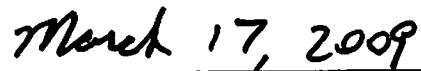
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SWORN STATEMENT

I have read the foregoing Motion and under the penalties of perjury, I state the facts stated therein are true and correct.



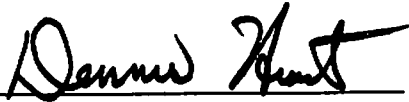
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DATE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been forwarded via U.S.P.S First Class Mail to Stephen M. Todd, Senior Assistant County Attorney, P.O. Box 1110, Tampa FL 33601-1110, on this 17th day of March 2009.



DENNIS HUNT
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DATE