

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No.: 2-cv-_____-RMR

_____, Plaintiff

v.

JARED POLIS (Gov. of Colo.), et al., Defendants.

MOTION TO APPOINT PRO-BONO COUNSEL

The Plaintiff, _____, pro-se, herewith moves this Court to appoint pro-bono counsel pursuant to D.C.Colo.LAtty15(e)(1) in the above-captioned case, and for cause states as follows:

1. The Plaintiff is an unrepresented prisoner. See Rule D.C.Colo.LAtty15(e)(1)(B).
2. The above-captioned case is complex, and is of a nature of great public interest. Complaints emanating from the issues which are implicated in this action have been continuously litigated for nearly 30 years, perhaps longer.
3. The case is meritorious. The Plaintiff has pled sufficient fact for this Court to recognize a set of plausibly-pled claims to relief are properly stated in the Complaint.
4. The Plaintiff is a pro-se prisoner held by the Defendants at _____ Correctional Facility. He has no legal training, and limited resources. He proceeds primarily with the assistance of a lay-person fellow prisoner.
5. Appointment of counsel will serve the Court's interests; e.g. more efficient control of the Court's docket, conferral between parties possible, potential for oral argument on motions, a streamlined discovery process, deposition of parties by counsel, and a more thorough examination of the issues raised in Plaintiff's Complaint, amid others.

For good cause shown, Plaintiff prays this Court appoint pro-bono counsel pursuant to D.C.Colo.LAttyR 15, and any further relief the Court may deem to be just.

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FOR THE DISTRICT OF COLORADO

Civil Action No.: 2 -cv- _____ -RMR

_____, Plaintiff
v.

JARED POLIS (Gov. of Colo.), et al., Defendants.

MOTION TO VACATE AND RESET ORAL ARGUMENT ON MOTIONS

The Plaintiff, _____, pro-se herewith moves this Court to vacate and reset oral argument on all defense motions to dismiss, postponing any oral argument until the pro-se Plaintiff has received an entry of appearance by counsel on his behalf, and for cause he states as follows:

1. The Plaintiff is an unrepresented prisoner.
2. The Plaintiff has sought entry of appearance by counsel on his behalf. In the near future, Plaintiff is likely to merge his case to the putative class-action Gambrell v. Stancil, et al., no. 24-cv-01853, or to be appointed pro-bono counsel by this Court pursuant to D.C.Colo.LAttyR 15(e)(1).
3. Oral Argument by pro-se Plaintiff can only serve to prejudice. Confronted by teams of counsellors and paralegals with access to virtually Unlimited taxpayer-funded resources, the pro-se Plaintiff will be made a fool. He is incapable of presenting a cognizable argument in support of his position without assistance. The CDOC has currently refused Plaintiff access to lay-person assistance in hearings, a recent policy change. Without assistance, oral argument will not materially assist in resolving these matters. Cf. D.C.Colo.L.Civ.R. 7.1.

For good cause shown, Plaintiff prays this Court Vacate and Reset Oral Argument on all motions in the instant case, and any further relief it may deem to be just.

CERTIFICATE OF SERVICE

I attest the foregoing _____
are transmitted to the Counsel for the Defendants by means of
electronic service, or service performed by first-class mail with
sufficient postage affixed, to the address(es) below:

Office of the Colorado Attorney General, 1300 Broadway, 10th floor,
Denver, CO 80203 service@coag.gov.

ATTN: _____

PLAINTIFF SIGNATURE

The enclosed are respectfully submitted this ____ day of _____, 2026.

Printed name: _____

Signature: _____

The foregoing document(s) are compiled and prepared
at the Plaintiff's specific direction with the
assistance of lay-person Eric St. George pursuant
to Johnson v. Avery, 393 US 483 (1969), and
Bounds v. Smith, 430 US 817 (1977)