

MEMORANDUM IN SUPPORT

Appellant lacks the skill or knowledge to adequately pursue Appellant's rights without the assistance of counsel. Counsel is essential to insure that Appellant's rights are fully litigated and all issues reviewed. Counsel is required to protect Appellant's constitutional rights. As attested by the Affidavit of Indigency filed herein, Appellant is without funds to hire an attorney.

The following special circumstances about Appellant and/or Appellant's case further support this request: Appellant is without the funds to pay for an attorney, Appellant lacks the skill or knowledge to adequately pursue Appellant's rights without the assistance of counsel.

WHEREFORE, Appellant respectfully request that counsel be appointed.

Respectfully Submitted,

Ronald Kelly Patterson Jr.
Ronald Kelly Patterson Jr.
Defendant, Appellant, pro se

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Motion for
Appointment of Counsel

has been sent by regular U.S. Mail to Juscarawas County Prosecutors,
125 East High Ave., New Philadelphia, Ohio
_____, on this 20th day of November, 2006.

Ronald Kelly Patterson Jr.
DEFENDANT, *pro se*