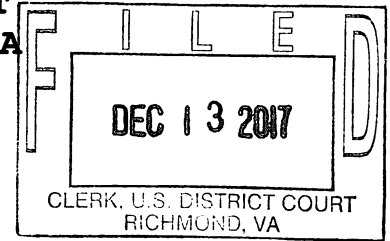


**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**



**LATASHA HOLLOWAY,**

**Plaintiff,**

**vs.**

**CIVIL ACTION NO:3:CV00773**

**CITY OF VIRGINIA BEACH, VIRGINIA,**

**Defendants.**

**MOTION FOR APPOINTMENT OF COUNSEL**

COMES NOW Plaintiff, LATASHA HOLLOWAY pro se, and respectfully request that this Court enter a order to appoint Counsel to represent the Plaintiff as follows:

1. On November 20, 2017, Latasha Holloway (“Holloway”) filed suit to challenge the at-large system of electing the eleven members of the Virginia Beach City Council (City Council”) and for violation of the ADA . The primary focus of her complaint is a claim that the City’s election structure dilutes the strength of “all people of color” within Virginia Beach in violation of Section 2 of the Voting Rights Act of 42 U.S.C. § 1973, 42 U.S.C. § 1983, the First, Fourteenth and Fifteenth Amendments to the U.S. Constitution.
2. The Plaintiff ask the Court to consider she lack the financial ability to retain counsel and properly prepare for trial.
3. The Plaintiff lack legal expertise to prepare responsive pleadings, affidavits, briefs, discovery, designate expert witnesses and investigate the critical issues that are so complex that, she can not reasonably be required to effectively present this case that legal assistance is necessary.

WHEREFORE FOR THE ABOVE-STATED REASONS, the Plaintiff respectfully request that the Court enter an order that would appoint Counsel in the interest of justice for the fair presentation of a proper case to the Court.

December 8, 2017

Respectfully Submitted,

By: 

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