

No. 21-511

IN THE

SUPREME COURT OF THE UNITED STATES

October Term, 2021

TIM SHOOP, Warden,

PETITIONER,

-vs-

RAYMOND TWYFORD,

RESPONDENT.

MOTION FOR APPOINTMENT OF COUNSEL

MICHAEL J. BENZA - 0061454 (Ohio)
Counsel of Record
17850 Geauga Lake Road
Chagrin Falls, Ohio 44023
(216) 319-1247
michael.benza@gmail.com

COUNSEL FOR RAYMOND TWYFORD

Now Comes Respondent, Raymond Twyford, and requests the appointment of counsel pursuant to 18 U.S.C. § 3006A, 18 U.S.C. § 3599, and Sup. Ct. Rule 29(7). Twyford is before this Court proceeding *in forma pauperis* and has proceeded as such throughout the underlying *habeas* litigation. *Twyford v. Bradshaw*, Case No. 2:03-cv-906, Southern District of Ohio.

Undersigned counsel was initially appointed to represent Mr. Twyford on October 2, 2003. This appointment was made via 18 U.S.C. § 3599. Counsel withdrew from representation on February 6, 2008 due to a change in employment. On October 15, 2017 counsel was reappointed to represent Mr. Twyford and has represented Mr. Twyford in the District Court and the Sixth Circuit and is familiar with the issues and the client.

Conclusion.

For the above stated reasons, Mr. Twyford requests the appointment of Michael J. Benza as counsel in this matter.

Respectfully Submitted,

MICHAEL J. BENZA (OH- 0061454)
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/s/ Michael J. Benza

COUNSEL FOR RAYMOND TWYFORD

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion for Appointment of Counsel was served by regular United States Mail on Benjamin Flowers, Solicitor General, 30 East Broad Street, 17th Floor, Columbus, Ohio 43215, this 19th day of March, 2022.

/s/ Michael J. Benza

COUNSEL FOR RAYMOND TWYFORD