

FILED

JUN 14 2017

May 30, 2017

Honorable Joe Heaton
Chief U.S. District Judge
200 N.W. 4th St.
Oklahoma City, OK 73102

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY RM DEPUTY

Re: *Barnes v City et al.*, USWD-OK, Case No. CIV-16-184-HE
Ellis v City et al., USWD-OK, Case No. CIV-16-19-HE
Gardner v City et al., USWD-OK, Case No. CIV-16-349-HE
Grate v. City et al., USWD-OK, Case No. CIV-16-0412-HE

Dear Judge Heaton:

As you know, I am indigent and cannot pay for an attorney to represent me in the above cases.

Unfortunately, I am ill-equipped to represent myself in these matters. I have no training in law, legal procedure, or cross-examination. I am currently incarcerated and do not have access to the Internet or a well-stocked law library. I cannot leave prison to depose the plaintiffs or investigate facts or legal matters. I cannot appear in person in your courtroom. I have been unable to obtain a full transcript of my trial. (The prison I am in will not allow me to receive an unredacted copy and the Public Defender's Office says it does not have the resources to provide me with a redacted copy. The transcript is thousands of pages long.)

The factual and legal issues in these cases are complex and my version of events is in sharp conflict with that of the plaintiffs. I truly hope to have an opportunity to defend myself. If the Court does not appoint counsel, I believe the absence of counsel will render my civil proceedings fundamentally unfair due to the complexity of the legal issues and number of plaintiffs making claims against me.

My defense has merit, but I need a qualified civil attorney to assist me in defending myself. I am innocent of all the criminal and civil charges made against me. Indeed, of the 13 women named in the criminal indictment, my jury fully acquitted me on all charges regarding 5 of the 13 women. To fairly and adequately defend myself against these civil allegations, to successfully navigate the complexity of these numerous civil proceedings, and to ultimately prove I am innocent of these civil and criminal charges, fundamental fairness dictates I have a due process right to appointed counsel.

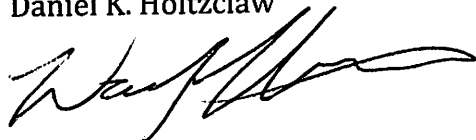
For instance, based on my limited understanding of civil procedure, as part of my right to meaningfully defend myself in these civil proceedings, I have a right to depose the 13 accusers. I absolutely want to exercise this right by deposing them, but I have no idea how to do so. A qualified civil attorney, though, could help me exercise this right so I could depose them.

Given that I am unable to represent myself in any meaningful way, I respectfully request that the Court appoint a qualified civil attorney to represent me in these cases. If that is not possible, I respectfully ask the Court to delay these proceedings until the Oklahoma Court of Criminal Appeals has issued a decision on my appeal.

Thank you for considering my requests. Please send any correspondence to my sister, Jennifer Holtzclaw, at Justice for D.H., P.O. Box 1193, Poway, CA 92074.

Sincerely,

Daniel K. Holtzclaw

A handwritten signature in black ink, appearing to read "Daniel K. Holtzclaw", written in a cursive style.