

**IN THE LONOKE COUNTY CIRCUIT COURT OF ARKANSAS**

**HEATH STOCKS**

**PETITIONER**

**VS**

**CASE NO. CR-97-9**

**STATE OF ARKANSAS**

**RESPONDENT**

**MOTION FOR APPOINTMENT OF COUNSEL**

Comes now, Heath Stocks, the Petitioner, moving this Court to grant his Motion for the Appointment of Counsel, and does so state;

1. Petitioner has a filed a motion for the issuance of the writ of coram nobis and writ of audita querela, and other relief with this court. Original petition filed on September 20, 2017.
2. Since, the filing of the motion/petition, the Prosecuting Attorney has filed a petition to seal the case, and this Court has granted the petition to seal.
3. This case involves very sensitive documents concerning child sexual abuse and psychological report. Petitioner will require the assistance of counsel to properly comply with this Court's Order of maintaining the confidentiality of these proceedings.
4. Due to the complexity of this case, justice would best be served in the interests of the State and the Stocks, by appointing counsel for Stocks.
5. Stocks moves this Court, to not appoint the Lonoke County Public Defender's Office to the case, because the Public Defender Larry Cook is responsible for the prior prosecutorial misconduct, and it would be a conflict of interest for his office to represent Stocks in any judicial proceedings before this Court.
6. Upon any finding of merit to Stocks's motions before this Court, it would lead to a resentencing and plea negotiations, that would require the expertise of trial counsel. If this Court

was to conduct any evidentiary hearings, it would be in the best interest of all parties, that Stocks be represented by counsel to make proper use of discovery.

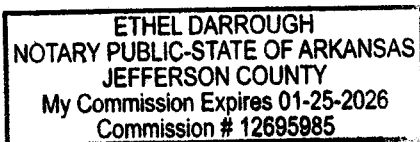
**CONCLUSION**

WHEREFORE, Stocks prays that this Court grant his Motion for Appointment of Counsel.

Respectfully submitted,  
*Heath Stocks*  
Heath Stocks

**VERIFICATION OF SIGNATURE**

I, Heath Stocks do swear and attest that I am filing this Motion for Appointment of Counsel; and the facts asserted herein are to the best of my knowledge and is not done in bad faith.



/s/ *Heath Stocks*  
Heath Stocks

State of Arkansas  
County of Jefferson

SUBSCRIBED AND SWORN TO BEFORE me a Notary Public on this 20<sup>th</sup> day of Sept 2017.

/s/ *Ethel Darrough*  
Notary Public

My Commission Expires: 01-25-2026

**CERTIFICATE OF SERVICE**

I, Heath Stocks hereby certify that I have serviced an exact copy of the foregoing to the Prosecuting Attorney Chuck Graham, Courthouse, 301 N. Center St., Ste. 301, Lonoke AR 72086-2892 on this 16 day of Sept 2017 by U. S. Mail postage prepaid.

*Heath Stocks*  
Heath Stocks