

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA

Tinika Se'Cal Warren v. Frank J. Bisignano

Warren · No. 2:25-cv-02228-MDC · Decided January 8, 2026

SUMMARY

The United States District Court for the District of Nevada denied without prejudice Tinika Se'Cal Warren's motions for appointment of counsel and notice of representation. The court found no extraordinary circumstances warranting appointment of counsel under 28 U.S.C. § 1915(e)(1), advised plaintiff to continue coordinating with the law firm referenced in her filings, and directed her to file a renewed in forma pauperis application if needed.

CASE DETAILS

COURT	United States District Court for the District of Nevada
WRITING FOR THE COURT	Maximiliano D. Couvillier, III
JURISDICTION	United States District Court for the District of Nevada
DECIDED	January 8, 2026
DOCKET	2:25-cv-02228-MDC
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for appointment of counsel and for notice of representation in a Social Security action.
PRECEDENTIAL VALUE	Unpublished district court order; persuasive rather than precedential.

TOPICS

civil procedure

PRACTICE AREAS

Civil procedure

Civil rights and access to justice

Social Security

QUESTIONS PRESENTED

1. Whether the court should appoint counsel for plaintiff under 28 U.S.C. § 1915(e)(1).
2. Whether the court should grant plaintiff's motion for notice of representation.

HOLDINGS

1. A federal court may request counsel to represent an indigent civil litigant only under extraordinary circumstances; plaintiff did not demonstrate extraordinary circumstances, so appointment of counsel was denied without prejudice.
2. The motion for notice of representation was denied without prejudice, and plaintiff was directed not to refile the motions; counsel could enter an appearance if the law firm agreed to represent plaintiff.

KEY QUOTATIONS

“While federal courts are empowered to request an attorney to represent an indigent civil litigant under 28 U.S.C. § 1915(e)(1), the court can only grant such requests under extraordinary circumstances.” (at 1)

FACTUAL BACKGROUND

Plaintiff sought appointment of counsel and filed a motion concerning notice of representation. The court observed that plaintiff appeared to be communicating with a law firm about representation but had not established grounds warranting court-requested counsel. The court also noted that plaintiff would need either to qualify to proceed in forma pauperis or pay the filing fee.

PROCEDURAL HISTORY

Plaintiff filed motions seeking appointment of an attorney and notice of representation. The district court denied both motions without prejudice and directed plaintiff not to refile them, while explaining that prospective counsel could enter an appearance if the law firm agreed to represent her.

DISPOSITION

other

CASES CITED

- United States v. 30.64 Acres of Land, 795 F.2d 796, 799-800 (9th Cir. 1986)
- Wilborn v. Escalderon, 789 F.2d 1328, 1331 (9th Cir. 1986)
- Thomas v. Arn, 474 U.S. 140, 142 (1985)
- Martinez v. Ylst, 951 F.2d 1153, 1157 (9th Cir. 1991)
- Britt v. Simi Valley United Sch. Dist., 708 F.2d 452, 454 (9th Cir. 1983)