

10-31-07.

THOMAS SHAY VS. United States

Civil no. 07-11752 RWZ
FILED
IN CLERKS OFFICE

2007 NOV -5 P 2:33
U.S. DISTRICT COURT
DISTRICT OF MASS.
The Defendant petitions the court to appoint counsel to help facilitate answering the legitimate and response from A.U.S.A. His 2255 claim, and response from A.U.S.A.

- a. The most important claim is that, The Defendant could not willingly sign a plea agreement while in unfit mental instability.
- B. The Defendant made his legal counsel aware of hearing voices and Judge Harrington, who unfortunately was unaware of the Defendant long-standing mental health history, should have afforded or made an effort to place the Defendant's mental health assessment at, during, or before the plea agreement took place.
- C. A Plea Agreement is a Federal contract. The Defendant must be able to choose, to make a decision, with all intents and purposes, with a sound mind, and this was not the case.
- D. The Agreement must be vacated. must be marked null and void and a new trial granted.

THOMAS SHAY 19193038

FBI, McKean

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