

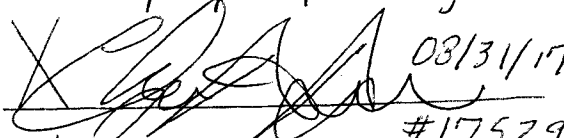
<p><u>UNITED STATES DISTRICT COURT</u>                  Alfred A. Arraj, United States Courthouse                  901 19<sup>th</sup> Street, Room A-105                  Denver, Colorado 80294-3589</p>	<p style="text-align: center;"><b>FILED</b>                  UNITED STATES DISTRICT COURT                  DENVER, COLORADO</p> <p style="text-align: center;"><b>NOV 06 2017</b></p> <p style="text-align: center;"><b>JEFFREY P. COLWELL</b>                  CLERK</p> <hr/> <p style="text-align: center;">o COURT USE ONLY o</p>
<p>Case No. 17-cv-00884-GPG/STV.</p>	
<p><u>CHAYCE AARON ANDERSON</u>                  Plaintiff.                  v.  <u>CARA BOXBERGER</u> →  <u>JASON SHUTTERS</u> →  <u>MARK DELANO</u> →                  Defendant(s).</p>	
<p>Chayce A. Anderson, "Pro Se" Counsel  <u>ATTORNEY OF THE RECORD</u>                  A.V.C.F. Facility                  12750 Hwy. 96                  Ordway, Co 81034</p>	<p>Case Number: 17-cv-00884-                  GPG/STV.</p> <p>Division/Courtroom: C203</p>
<p>MOTION TO AMEND "AMENDED PRISONER COMPLAINT" IN COMPLIANCE WITH FEDERAL RULE OF CIVIL PROCEDURE #15.</p>	

COMES NOW Chayce A. Anderson, counsel "Pro Se" for the Plaintiff, Chayce A. Anderson, who is filing a "MOTION TO AMEND" the Amended Prisoner Complaint to a Second Amended Prisoner Complaint pursuant to Federal Rule of Civil Procedure #15. This motion is made in furtherance of Mr. Anderson's Federal and state constitutional rights to due process, access to justice, and his right to defend his liberty or person.

As grounds for this motion, Mr. Anderson states:  
 (1). Mr. Anderson has endured over at least a dozen facility transfers since the original and amended filings.

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- (2.) Mr. Anderson received most legal mail on a DELAYED BASIS.
- (3.) Mr. Anderson's Amended Prisoner Complaint was filed under extreme "Undue Durrress."
- (4.) Mr. Anderson "should be afforded a fair and equal opportunity to amend the 'Amended Complaint' to address any issues before any Defendant(s) are removed from the suit."
- (5.) Mr. Anderson believes the ORDER issued on July 6<sup>th</sup>, 2017 by the Honorable Senior Judge Babcock was a precursory glance that failed to acknowledge the true depth of several claims.
- (6.) Mr. Anderson has in "good faith" attempted to finish the "SECOND AMENDED PRISONER COMPLAINT" in a timely and efficient manner, but has ~~suffered~~ suffered "extraordinary circumstances" due to transfers that have affected His ability to represent himself.
- (7.) This motion is in compliance with Federal Rule of Civil Procedure #15: Amended and Supplemental Pleadings:
  - (a)(1)(A) & (B). This should be allowed before because it does affect the named defendants. This also complies with the (c)(1)(A), (B), & (C). In particular, these reference (c)(1)(B): "the amendment asserts a claim or defense that arouse out of the conduct, transaction, or occurrence set out - or attempted to be set out - in the original pleadings." Mr. Anderson attempted to set these claims out in the "A.P.C.," but needs to reassert claims in a "S.A.P.C." to properly meet justice.

  
08/31/17  
#175290  
Chayce Aaron Anderson  
Arkansas Valley Corr. Facility