ACCEPTED
06-14-00086-CR
SIXTH COURT OF APPEALS
TEXARKANA, TEXAS
12/29/2014 10:29:26 PM
DEBBIE AUTREY
CLERK

NO. 06-14-00086-CR

STATE OF TEXAS	§	**IN THE**	FILED IN 6th COURT OF APPEALS TEXARKANA, TEXAS 12/29/2014 10:29:26 PM DEBBIE AUTREY Clerk
	§		
VS.	§	**6th COURT**	
	§		
MARK ANTHONY YOUNG	§	**OF APPEALS**	

MOTION TO EXTEND TIME TO FILE APPELLANT'S BRIEF 3RD

TO THE HONORABLE JUSTICES OF SAID COURT:

Now comes Mark Anthony Young, Appellant in the above styled and numbered cause, and moves this Court to grant an extension of time to file appellant's brief, pursuant to Rule 38.6 of the Texas Rules of Appellate Procedure, and for good cause shows the following:

1. This case is on appeal from the 354th Judicial District Court of Hunt County, Texas.

2. The case below was styled the STATE OF TEXAS vs. Mark Anthony Young, and numbered 29,236.

3. Appellant was convicted of Aggravated Robbery.

4. Appellant was assessed a sentence of Fifty (50) Years on May 1, 2014.

5. Notice of appeal was given on May 2, 2014.

6. The clerk's record was filed on August 14, 2014; the reporter's record was filed on October 2, 2014.

7. The appellate brief is presently due on December 29, 2014.

8. Appellant requests an extension of time of 14 days from the present date.

9. Two previous extensions to file the brief have been received in this cause.

10. Defendant is currently incarcerated.

11. Appellant relies on the following facts as good cause for the requested extension:

Appellant's attorney has worked to timely complete the brief, however during the drafting process on December 28, 2014 a close family member unexpectedly and suddenly passed away. Counsel has been working since the morning of December 28, 2014 assisting the family with necessary arrangements. At this time Counsel has not confirmed the funeral date.

Additionally Jason A. Duff has begun a review the several volumes in the reporters record as well as the clerks record the record; but, Appellant's counsel requests additional time to sufficiently develop the arguments material to the brief.

Additionally, Counsel was on vacation from the afternoon of December 24, 2014 through December 28, 2014.

Counsel is also appointed in:

Garza v. State Appellate Cause numbers 06-14-00088-CR through

06-14-00093, and filed multiple briefs relating to that case December 22, 2014,

Counsel is appointed in *Semaj Milan Yrnah Smith v. State, Appellate Cause No. 06-14-00158-CR* and filed a brief on December 23, 2014,

Willie Frank Jackson v. State Appellate Cause numbers 06-14-00097-CR with a brief due December 29, 2014.

Donny Joe Curry v. State Appellate Cause numbers 06-14-00139-CR thru 06-14-00142-CR with a brief due December 29, 2014.

Bennett v. State Cause number 06-14-00050-CR where Appellant's attorney filed a brief on November 17, 2014 and is awaiting Appellee's brief,

AND

Grubbs v. State Appellate Cause numbers 06-14-00116-CR & 06-14-00117-CR and is awaiting the Reporter's record.

Appellant counsel's represented his client at trial in Cause No. CC1400383 Jim Lee Odom v. Troy Morrison in County Court at Law No. 2 of Hunt County Texas on December 16, 2014

Then counsel participated settlement conferences in Cause No. 80,433 *ITIO of L.W.* and Cause No. 80219, *ITIO M.S. E.S and B.M.* on December 2, 2014. After the parties failed to reach a settlement in Cause No. 80219, *ITIO M.S. E.S and B.M.* on December 2, 2014, the trial court ordered the parties back to another conference on December 23, 2014.

Counsel prepared for and represented his clients in an Adversarial hearings in Hunt County Child Protection Court for Northeast Texas #2 on December 3, 2014 in Cause No. 81,304 *In the Interest of TH & Z.H.,* Children, as well as a Final Hearing in Cause No. 80,139 In the *Interest of D.B., a Child* in the 196th Judicial District among several others.

Counsel prepared for and represented his clients in an Adversarial hearing in Cause No. 81,304 In the Interest of T.H. &Z.H., Children on December 18, 2014.

WHEREFORE, PREMISES CONSIDERED, Appellant prays that this Court grant this Motion To Extend Time to File Appellant's Brief, and for such other and further relief as the Court may deem appropriate.

Respectfully submitted,

Jason A. Duff
2615 Lee St
Greenville, TX 75403
Tel: 903.455.1991
Fax:903.455.1417

By: */s/ Jason A. Duff*
Jason A. Duff
State Bar No. 24059696
jasonaduff@hotmail.com
Attorney for Mark Anthony Young

CERTIFICATE OF SERVICE

This is to certify that on December 29, 2014, a true and correct copy of the above and foregoing document was served on the District Attorney's Office, Hunt County, electronic filing service.

/s/ Jason A. Duff
Jason A. Duff