PD-1086-15

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COURT OF CRIMINAL APPEALS
AUSTIN, TEXAS
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ABEL ACOSTA
CLERK

TO THE COURT OF CRIMINAL APPEALS

FROM THE FIRST COURT OF APPEALS
NO. 01-11-00258-CR

JEREMY THOMAS
APPELLANT

On Appeal from Cause Number 1284896
From the 177th District Court of Harris County

V.

THE STATE OF TEXAS
APPELLEE

Appellant's Motion To Extend Time
To File Petition For Discretionary Review

TO THE HONORABLE JUDGES OF THE COURT OF CRIMINAL APPEALS:

COMES NOW, JEREMY THOMAS, and files this his Motion to Extend Time to File Petition for Discretionary Review, and in support thereof, would respectfully show the Court the following:

I.

The First Court of Appeals affirmed the trial court's judgment in *Thomas v. State,* 01-11-00258-CR, 2015 WL 4101164 (Tex. App.—Houston [1st Dist.] July 7, 2015). No motion for rehearing was filed. No other motions for extension have been filed.

II.

In compliance with Texas Rule of Appellate Procedure 68.2(c), this motion for extension is timely filed within 15 days of the deadline for the PDR, which was August 6, 2015. Appellant requests this extension due to the fact that counsel for Appellant has been engaged in work in the Harris County Public Defender's Office on many cases, including the following:

- *Ajah Foster,* PD-0963-15
- *Domingo Medina,* 01-15-00574-CR
- *Kori Henegar,* 14-15-00529-CR
- *Trey Foster,* 14-15-00496-CR
- *Hugo Pachas-Luna,* 01-14-00516-CR - 01-14-00520-CR
- *Rodney Robins,* 01-14-00582-CR
- *Stephen Hopper,* 14-15-00371-CR

FILED IN
COURT OF CRIMINAL APPEALS

August 20, 2015

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- *Pete Rodriguez,* 14-15-00339-CR
- *Vincent Williams,* 14-15-00220-CR
- *Darryle Robertson,* 14-15-00132-CR
- Counsel has been researching and writing for several trial cases assigned to the Public Defender's Office Trial Division.

III.

Appellant's attorney requests this brief extension which is necessary so that the petition can be thoroughly written and timely filed. This motion is not made for the purpose of delay.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Appellant prays that this Honorable Court grants this requested extension of time to file the appellant's petition for discretionary review in the above cause and extend the time for filing for 30 days, to September 6, 2015.

Respectfully submitted,

ALEXANDER BUNIN
Chief Public Defender
Harris County, Texas

/s/Sarah V. Wood
SARAH V. WOOD
Assistant Public Defender
Harris County, Texas
Texas Bar Number 24048898
1201 Franklin, 13th Floor
Houston Texas 77002
713.368.0016 (phone)
713.368.9278 (fax)
Sarah.Wood@pdo.hctx.net

Attorney for Appellant

CERTIFICATE OF SERVICE

By my signature below, I hereby certify that a true and correct copy of the above and foregoing Appellant's Motion to Extend Time to File Petition for Discretionary Review has been served on the District Attorney of Harris County, Texas, by electronic delivery through the efile system.

/s/Sarah V. Wood
Sarah V. Wood