PD-1599-15
COURT OF CRIMINAL APPEALS
AUSTIN, TEXAS
Transmitted 12/9/2015 9:43:46 AM
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ABEL ACOSTA
CLERK

PD No:_____

JACOB BRENT SMITH	IN THE TEXAS COURT
VS.	OF CRIMINAL APPEALS
STATE OF TEXAS	AUSTIN, TEXAS

MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S *PRO-SE* PETITION FOR DISCRETIONARY REVIEW

TO THE HONORABLE JUDGES OF SAID COURT:

COMES NOW, Appellant, by and through the undersigned attorney, who has personal knowledge of the matters contained herein, and files this Motion for Extension of Time to File Appellant's *Pro-Se* Petition for Discretionary Review, and in support thereof would show:

I.

Appellant was convicted of evading arrest or detention in a vehicle and sentenced to 30 years in the Texas Department of Criminal Justice - Institutional. The trial court was the 185th District Court of Harris County, Texas. The trial court cause number was: 1410410. On December 1, 2015, the Fourteenth Court of Appeals in Houston, Texas, affirmed appellant's conviction in appellate cause number: 14-14-00681-CR.

II.

The current deadline for filing appellant's Petition for Discretionary Review is December 31, 2015.

FILED IN
COURT OF CRIMINAL APPEALS

December 11, 2015

ABEL ACOSTA, CLERK

III.

No previous extension of time to file a Petition for Discretionary Review has been requested by appellant.

IV.

The undersigned is not pursuing further appellate review on behalf of Mr. Smith. The undersigned is notifying appellant of his right to pursue a Petition for Discretionary Review in this Court.

V.

Appellant is requesting an additional thirty (30) day extension until February 1, 2016 in which to file his *pro-se* Petition for Discretionary Review in this matter.

VI.

This request is not made for the purpose of delay but to insure Appellant's right to appellate review in this matter.

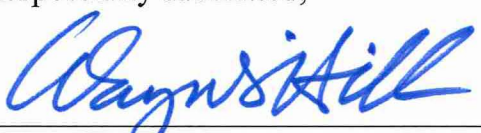
VII.

Appellant's last known address within the Texas Department of Criminal Justice is:

Mr. Jacob Brent Smith
TDCJ-ID # 1947387
Eastham Unit
2665 Prison Road 1
Lovelady, Texas 75851

WHEREFORE, PREMISES CONSIDERED, the undersigned prays that the Court grant this Motion for Extension of Time to File Appellant's *Pro-Se* Petition for Discretionary Review until February 1, 2016.

Respectfully submitted,



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CERTIFICATE OF SERVICE

A true and correct copy of this motion was mailed to:

Harris County District Attorney's Office
Appellate Division
1201 Franklin, 6th Floor
Houston, Texas 77002

Mr. Jacob Smith
(Address noted above)



Wayne T. Hill