ACCEPTED
12-15-00173-CR
TWELFTH COURT OF APPEALS
TYLER, TEXAS
12/17/2015 11:06:37 PM
Pam Estes
CLERK

No. 12-15-00173-CR

MICHAEL JOHNSON	§	**IN THE COURT OF APPEALS**
Appellant	§	
	§	
vs.	§	**12TH JUDICIAL DISTRICT**
	§	
THE STATE OF TEXAS,	§	
Appelle	§	**AT TYLER, TEXAS**

FILED IN
12th COURT OF APPEALS
TYLER, TEXAS
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PAM ESTES
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APPELLANT'S SECOND MOTION FOR EXTENSION OF TIME TO FILE BRIEF, 30-DAY REQUEST

TO THE HONORABLE COURT:

Now comes Austin Reeve Jackson, counsel for Appellant in the above entitled and numbered cause, and makes this Motion, and for good cause shows the following:

I.

Appellant's brief in this matter is due on 17 December 2015. One prior extension has been requested.

II.

While working on this case counsel has also been working on approximately 50 open appellate cases in this and other courts to which he has been appointed by Smith County. This has included investigating motions for new trials (looking for and talking with potential witnesses, jail and office visits with new appellate appointments, trial court appearances for the same), requests for and reviews of reporter's and clerk's records, research, briefing, review of opinions, investigation of potential PDR issues, etc. While

not all of these cases have required significant attention from counsel during this time, many of them have which has resulted in counsel having been unable to devote the full attention necessary to this case prior to today's date.

Because of this, counsel was delayed in completing his brief in this matter.

II.

One prior extensions have been requested and is respectfully prayed that the in the interest of justice, the Court grant this motion.

WHEREFORE, PREMISES CONSIDERED, undersigned counsel respectfully prays that, in accordance with the applicable law, the Court grant this Motion and extend the date by which to file a brief by thirty days.

Respectfully submitted,

/s/Austin Reeve Jackson
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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing document was served on counsel for the State by efile concurrently with its filing.

/s/Austin Reeve Jackson