PD-1653-15
COURT OF CRIMINAL APPEALS
AUSTIN, TEXAS
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ABEL ACOSTA
CLERK

No. _____

IN THE COURT OF CRIMINAL APPEALS

ROBERTA MARGARET COOK,
Applicant,

v.

THE STATE OF TEXAS,
Respondent.

FIRST UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE PETITION FOR DISCRETIONARY REVIEW

STEPHEN CASEY
Counsel of Record

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FILED IN
COURT OF CRIMINAL APPEALS

December 18, 2015

ABEL ACOSTA, CLERK

TO THE HONORABE COURT OF CRIMINAL APPEALS OF TEXAS:

Applicant files this First Unopposed Motion for Extension of Time to File Petition For Discretionary Review. In support of this motion, Applicant shows the following:

1. The 359th Judicial District Court of Montgomery County, Texas, rendered its judgment in *State of Texas vs. Roberta Margaret Cook*, Cause No. 12-03-0258-CR, on May 22, 2014. The case was appealed to the Ninth District Court of Appeals.

2. The Ninth District Court of Appeals at Beaumont, Texas, affirmed the trial court's judgment in *Roberta Margaret Cook v. The State of Texas*, No. 09-14-00461-CR, on November 18, 2015.

3. Applicant's Petition for Discretionary Review is due no later than December 18, 2015.

4. Applicant is requesting a due date of February 26, 2016. This is Applicant's first request for an extension of time in this case.

5. Applicant relies on the following facts as a reasonable explanation for the requested extension of time:

1. Applicant's family has been undergoing an extreme health crisis, which has been placed in the forefront of all else.

2. In light of the ongoing health crisis, Applicant has just recently notified Counsel to go forward with the Petition for Discretionary Review.

6. The undersigned has conferred with opposing counsel, who indicated there was no opposition to this request.

Therefore, Applicant prays the Court will grant the motion.

Respectfully submitted,

/s/ Stephen Casey

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CERTIFICATE OF CONFERENCE

I hereby certify that I have conferenced with opposing counsel, via e-mail, on December 16, 2015. Opposing Counsel is unopposed to the motion.

/s/Stephen Casey

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing motion has been served on Friday, December 18, 2015, on the following via electronic transmission:

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