PD-1640-15
COURT OF CRIMINAL APPEALS
AUSTIN, TEXAS
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ABEL ACOSTA
CLERK

**Appellate No. 09-14-00062-CR**

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| **MARC RICHARD SAUNDERS** | **§** | **IN THE TEXAS COURT OF** |
| | **§** | **CRIMINAL APPEALS** |
| | **§** | |
| **VS.** | **§** | |
| | **§** | |
| **STATE OF TEXAS** | **§** | |

**MOTION TO EXTEND TIME**
**TO FILE PETITION FOR DISCRETIONARY REVIEW**

**TO THE HONORABLE JUSTICES OF SAID COURT:**

Now comes MARC RICHARD SAUNDERS, Appellant in the above styled and numbered cause, and moves this Court to grant an extension of time to file appellant's Petition for Discretionary Review and for good cause shows the following:

1. This case is on appeal from the Ninth District Court of Appeals in Beaumont, styled *MARC RICHARD SAUNDERS vs. STATE OF TEXAS* and was given Appellate No. 09-14-00062-CR.
2. The Court of Appeals' judgment was signed November 18, 2015.
3. The deadline to file Petition for Discretionary Review is December 18, 2015.

FILED IN
COURT OF CRIMINAL APPEALS

December 18, 2015

ABEL ACOSTA, CLERK

4. Appellant requests an extension of time until January 18, 2016 or a time period of at least 30 days.

5. Appellant has not requested any prior extensions regarding petition for discretionary review.

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

Counsel is a solo practitioner and has been involved in or prepared for the following criminal trials, appeals or motions:

(i) Montgomery County, *State of Texas v. Mike Angel Ulloa*, 221st District Court, 14-02-02317-CR, Tampering; Writ of Habeas Corpus Appeal, Beaumont Court of Appeals, 9th District, 09-15-00398-CR

(ii) United States District Court Southern District of Texas, *United States v. Darnell Menard*, 15cr296-01 , *Judge Atlas Houston,* Conspiracy, and multiple counts of fraud related activity under 18 USC 1029(a)(2);(a)(3); and (b)(2).

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

Respectfully submitted

/S/ Richard Martin P. Canlas
**RICHARD MARTIN P. CANLAS**

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## Certificate of Service

I certify that a true and correct copy of this motion was:

(a) faxed to Bill Delmore, Montgomery County District Attorney's Office, 936.760.6940, on December 17, 2015

/S/ Richard Martin P. Canlas
Richard Martin P. Canlas