PD-1660-15
COURT OF CRIMINAL APPEALS
AUSTIN, TEXAS
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ABEL ACOSTA
CLERK

IN THE COURT OF CRIMINAL APPEALS
FOR THE STATE OF TEXAS

FILED IN
COURT OF CRIMINAL APPEALS

DECEMBER 21, 2015

ABEL ACOSTA, CLERK

JUSTIN LEE BRINEGAR Appellant	*	
vs.	*	No. COA No. 10-14-00195-CR
THE STATE OF TEXAS, Appellee	*	

MOTION FOR EXTENSION OF TIME TO
FILE PETITION FOR DISCRETIONARY REVIEW

TO THE HONORABLE COURT OF APPEALS:

COMES NOW, the Appellant, by and through her undersigned Attorney of Record, and respectfully moves the Court to extend the time for filing a petition for discretionary review in this cause, and in support therefore would show the Court as follows:

I.

That appellant was found guilty of the offense of Aggravated Sexual Assault of a Child in Cause No 2012-1942-C1 in the 54th District Court of McLennan County, Texas. Appellant was sentenced by the court and timely gave notice of Appeal..

II.

Appellant's petition for discretionary review is currently due on December 7, 2015

III.

Appellant hereby requests an extension of time to file his Petition for Discretionary Review until January 5, 2015, and as reasons therefore would show this cause as follows:

Counsel was unable to complete the petition by the current day. Counsel's secretary was out for an extended period of time due to a medical emergency. Counsel believed that the extension in this case had been taken care of, but only recently discovered it had not been. As a result, the petition has not been completed and filed. Counsel's secretary returned to work last week, and counsel is now in a position to complete and file the petition.

WHEREFORE, PREMISES CONSIDERED, Appellant respectfully requests this honorable court to extend the time for filing Appellant's Petition for Discretionary Review in this cause to January 5, 2015.

Respectfully submitted,

/s/ Walter M. Reaves, Jr.
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing motion was delivered to Abel Reyna, District Attorney for McLennan County, Texas, on December 17, 2015.

/s/ Walter M. Reaves, Jr.
Walter M. Reaves, Jr.