PD-1679-15

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COURT OF CRIMINAL APPEALS

DEC 23 2015

Abel Acosta, Clerk

THE TEXAS COURT OF CRIMINAL APPEALS

MARCUS LESLIE, §
Appellant pro se §
§
VS. § COA CASE NO. 06-15-00057-CR
§
THE STATE OF TEXAS §

FILED IN
COURT OF CRIMINAL APPEALS
DEC 23 2015
Abel Acosta, Clerk

MOTION FOR EXTENSION OF TIME
TO FILE PRO SE
PETITION FOR DISCRETIONARY REVIEW

TO THE HONORABLE JUDGES OF SAID COURT:

COMES NOW, Marcus Leslie,. styled hereinafter as "Appellant" pro se and respectfully files this Motion for Extension of Time in which to file a Petition for Discretionary Review (PDR), pursuant to Tex.RulesApp.Proc. 68.

On December 3, 2015 the Sixth Court of Appeals rendered its opinion regarding Appellant's Direct Appeal; to delete the deadly weapon finding from the trial court's judgment and affirm the judgment, as modified.
For the following reasons, Appellant is requesting an additional 60-days to prepare his PDR:

1) Appellant's deadline for filing a PDR is January 3, 2015;

2) Appellant has requested no previous extensions of time in this action;

3) Appellant is a pro se litigant and a layman to law and all of its complicated rules, and should not be held to the exact same time constraints and standards as a licensed attorney; and

4) inherent delays with the prison law library's next-day shepardizing and inter-loan system, limited legal resources, and outdated books, additional time is required to receive legal material and cases, research, compose, and deliver documents to the courts.

Because of these reasons and in order to adequately prepare an effective and viable PDR worthy of this Court's consideration, Appellant request this Honorable Court to extend his time to file his PDR.

PRAYER

WHEREFORE PREMISES CONSIDERED, Appellant PRAYS that this Court GRANT this motion and extend the deadline to file the PDR an additional 60-days. The applicant presents this motion for no reason of delay other than justice being served.

[SUBMITTED and SUBSCRIBED on this the 21 day of December 2015]

Respectfully submitted

Marcus Leslie

Appellant pro se - TDCJ #2001223
Connally Unit
899 FM 632
Kenedy, Texas 78119

DECLARATION

"I, Marcus Leslie, TDCJ #2001223, presently incarcerated in The TDCJ-CID at the Connally Unit in Karnes County, Texas, declare under penalty of perjury under Chapter 132 of Texas Civil Practices and Remedies Code and 28 U.S.C. § 1746, that the facts stated in this motion are true and correct and that I placed this document in the prison mailbox on this date."

"Executed on this the 21 day of December 2015."

Marcus Leslie
Marcus Leslie, pro se

CERTIFICATE OF SERVICE

I certify that on this the 21 day of December 2015, I sent the following parties a true and correct copy of this motion by U.S. Mail thru the prison mail system in a postage paid package to the addresses listed below;

Texas Court of Criminal Appeals
P.O. Box 12308, Capitol Station
Austin, Texas 78711-2308
Attn: Abel Acosta, Court Clerk

District Attorney's Office
601 Main St.
Texarkana, Texas 75501
Attn: Lauren Sutton, Asst.DA

Marcus Leslie
Marcus Leslie, #2001223