PD-0564-16
COURT OF CRIMINAL APPEALS
AUSTIN, TEXAS
Transmitted 5/20/2016 10:36:54 AM
Accepted 5/20/2016 3:16:08 PM
ABEL ACOSTA
CLERK

No. _____
In the
Court of Criminal Appeals
At Austin

No. 14-15-00254-CR

In the
Court of Appeals
for the
Fourteenth District of Texas
at Houston

FILED IN
COURT OF CRIMINAL APPEALS

May 20, 2016

ABEL ACOSTA, CLERK

No. 1396938
In the 178th District Court
Harris County, Texas

ALFREDO RAMIREZ
Appellant
V.
THE STATE OF TEXAS
Appellee

APPELLANT'S MOTION FOR EXTENSION OF TIME WITHIN WHICH TO FILE PETITION FOR DISCRETIONARY REVIEW

TO THE HONORABLE COURT OF APPEALS:

APPELLANT, Alfredo Ramirez, pursuant to TEX. R. APP. P. 68.2(c) moves for an extension of time within which to file its petition for discretionary review. In support of its motion, appellant submits the following:

1. Appellant was charged with felony assault on a family member by impeding breathing.

2. A jury found Appellant guilty and the Court sentenced him on March 2, 2015 to 20 years confinement in the Texas Department of Corrections Institutional Division.

3. A unanimous panel of the Fourteenth Court of Appeals rendered judgment in an unpublished opinion on April 21, 2016, affirming appellant's conviction and sentence.

4. Appellant's petition for discretionary review is due May 21, 2016.

5. Appellant seeks an extension, in accordance with TEX. R. APP. P. 68.2(c), until June 21, 2016, to file its petition for discretionary review. This is appellant's first request for an extension.

6. Petitioner is presently incarcerated in TDCJ and counsel needs additional time to prepare his petition for discretionary review due to her current caseload. Appellant's petition is not for purposes of delay, but so that justice may be done.

WHEREFORE, the Appellant prays that this Court will grant the requested extension until June 21, 2016.

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing instrument has been emailed to the following:

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Appellate Division
Harris County District Attorney's Office
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Houston, Texas 77002-1923

_/s/ Tonya Rolland McLaughlin__
Tonya Rolland McLaughlin