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COURT OF CRIMINAL APPEALS

MAY 31 2016

Abel Acosta, Clerk

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JUN 06 2016

Abel Acosta, Clerk

NO. 14-15-00244-CR
NO. 14-15-00245-CR
NO. 14-15-00246-CR
NO. 14-15-00247-CR

IN THE
COURT OF CRIMINAL APPEALS

WALTER LOUIS JACKSON, JR
Appellant

V.

THE STATE OF TEXAS
Appellee

APPEAL FROM THE 268th DISTRICT COURT
OF FORT BEND COUNTY, TEXAS
TRIAL COURT CAUSE NUMBERS 12-DCR-062008;
12-DCR-062010; 12-DCR-062011; 12-DCR-062012

APPELLANT'S FIRST MOTION FOR EXTENSION OF TIME TO FILE P.D.R.

WALTER LOUIS JACKSON, JR
TDCJ-ID# 1982826
BETO UNIT
1391 FM 3328
TENN COLONY TX 75880

Walter Louis Jackson 3/1.
T.D.C.J. # 01982826
George Beto Unit
1391 F.M. 3328
Tennessee Colony, Tx. 75880

IN THE

COURT OF CRIMINAL APPEALS

WALTER LOUIS JACKSON, JR, Appellant

v.

THE STATE OF TEXAS, Appellee

TO THE HONORABLE JUDGES OF SAID COURT:

THE STATE OF TEXAS, Appellant, moves for an extension of SIXTY (60) days in which to file a P.D.R. pursuant to TEX. R. APP. P. 10.5(b) and shows:

Pursuant to TEX. R. APP. P. 10.5(b), Appellant, moves this Court to allow an extension of SIXTY (60) days to file his brief. Appellants convictions were affirmed by the Fourteenth Court of Appeals on May 5th, 2016 and pursuant to TEX. R. APP. P. 68. Appellant is preparing his petition for discretionary review

II.

REQUIRED INFORMATION PURSUANT TO THE RULES OF APPELLATE PROCEDURE

The deadline for filing the extension. TEX. R. APP. P. 10.5 (b)(1)(A): June 5, 2016.

> TEX. R. APP. P. 38.6(D):"A motion to extend the time to file a brief may be filed before or after the date the brief is due."

The length of the extension sought. TEX. R. APP. P. 10.5(b) (1)(B): Sixty (60) days.

The facts relied upon to reasonably explain the need for the extension. TEX. R. APP. P. 10.5(b)(1)(B):

> Appellant has no experience in pro se litigation and is working with jailhouse lawyers to get some assistance in this matter. Additionally, Appellant is attending the Beto Unit law library to hopefully prepare a congent P.D.R. in this matter. The sixty (60) days extension should be adequate to complete the P.D.R.

Number of previous extensions granted for previous Motions for Extension. TEX. R. APP. P. 10.5(b)(1)(D): NONE

III.

The additional time requested is not sought solely for delay nor sought frivolously, but will be of genuine assistance to Appellant's preparing petition for discretionary review.

WHEREFORE, Appellant prays that the Court grant this Motion and modify and extend the deadliine for filing Appellant's petition for discretionary review to July 27, 2016, or that this Court grant such additional time as is just and proper.

Respectfully submitted,

Walter Louis Jackson, Jr
TDCJ ID# 1982826
Beto Unit
1391 FM 3328
Tennessee Colony, TX 75880

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing motion for Appellant has this day been sent by U.S. Postal Services to State's Attorney for Appellant on

Walter Louis Jackson, Jr

/Walter Louis Jackson Jr.
T.D.C.J. # 01982826
George Beto Unit
1391 F.M. 3328
Tennessee Colony, Tx. 75880

WALTER LOUIS JACKSON, JR,
Appellant

v.

THE STATE OF TEXAS,
Appellee

IN THE COURT OF
CRIMINAL APPEALS, AUSTIN

ON APPEAL FROM THE FOURTEENTH COURT OF APPEALS
NO. 14-15-00244-CR; NO. 14-15-00245-CR; NO. 14-15-00246-CR

ON APPEAL FROM THE 268TH DISTRICT COURT, FORT BEND COUNTY, TX
Trial court case nos. 12-DCR-062008; 12-DCR-062010;
12-DCR-062011; and, 12-DCR-062012

Appellant's pro se Motion to Suspend Rule 9.3(b). TEX.R.APP.P.

TO THE HONORABLE JUDGES OF THE COURT:

COMES NOW Walter Louis Jackson, Jr, and moves the Court to grant this, his Motion to Suspend Rule 9.3(b). TEX.R.APP.P. and allow Appellant to file one (1) copy of his P.D.R. For the following reasons:

Appellant was declared indigent and appointed counsel on direct appeal, Appellant remains indigent and cannot afford paper, pens and postage to file multiple copies and addition does not have access to copy machines confined in TDCJ-ID.

WHEREFORE, Appellant prays this Court grant this Motion and suspend Rule 9.3(b). TEX.R.APP.P.

Respectfully submitted,

Walter Louis Jackson, Jr.
TDCJ ID# 1982826
Beto Unit
1391 FM 3328
Tennessee Colony, TX 75880

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