ACCEPTED
06-16-00067-CR
SIXTH COURT OF APPEALS
TEXARKANA, TEXAS
6/30/2016 5:49:53 PM
DEBBIE AUTREY
CLERK

SIXTH COURT OF APPEALS
TEXARKANA, TEXAS

06-16-00067-CR

FILED IN
6th COURT OF APPEALS
TEXARKANA, TEXAS
7/1/2016 8:13:00 AM
DEBBIE AUTREY
Clerk

MICHAEL ALAN HODGES

VS.

THE STATE OF TEXAS

MOTION FOR EXTENSION OF TIME TO FILE BRIEF

TO THE HONORABLE JUSTICES OF SAID COURT:

COMES NOW, Appellant and files this request for an extension of time to file his brief and would show unto the Court the following:

Court below:	54th District Court
Cause number below:	No 2014-1486-C2
Date Petition for Discretionary Review refused:	NA
Present deadline for filing Appellant's Brief:	June 30, 2016
Days requested by this extension:	30 days
Date to which extension is requested:	July 30, 2016
Number of extensions previously granted:	1

I.

The Appellant's request is based upon the following reasonable explanation of the need for additional time, within the personal knowledge of Charles W. McDonald, the attorney signing this motion, Pursuant to TEX. R. APP. PROC. 10.5(b), namely:

II.

Counsel requests thirty (30) additional days to complete the brief as counsel unexpectedly had to file an eighty (80) page summary judgment response. Counsel assures the Court that this request is not for the sake of delay. Counsel unfortunately, at times, believes he can get out the quantity of work today that he could thirty (30) years ago, albeit this is not always an accurate assessment.

III.

Appellant requests that the Court grant this motion and extend the time and deadline for the filing of appellant's brief as asked for, or the Court grant such additional time as is just and proper, and accordingly, Appellant so prays.

Respectfully submitted,

/s/*Charles W. McDonald*

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the above and foregoing instrument was served upon Abelino "Abel" Reyna, McLennan County Criminal District Attorney, 219 N. Sixth Street, Suite 200, Waco, Texas 76701-1363, according to rule and law, this 30th day of June, 2016.

/s/*Charles W. McDonald*
Charles W. McDonald