ACCEPTED
06-16-00040-CR
SIXTH COURT OF APPEALS
TEXARKANA, TEXAS
7/7/2016 9:55:54 AM
DEBBIE AUTREY
CLERK

No. 06-16-0040-CR

TEVIN WILLIS,	§	**IN THE SIXTH DISTRICT**
Appellant	§	
	§	
VS.	§	**COURT OF APPEALS**
	§	
THE STATE OF TEXAS,	§	
Appellee	§	**OF THE STATE OF TEXAS**

FILED IN
6th COURT OF APPEALS
TEXARKANA, TEXAS
7/7/2016 9:55:54 AM
DEBBIE AUTREY
Clerk

APPELLANT'S MOTION TO EXTEND TIME TO FILE THE BRIEF

Appellant, Tevin Willis (Willis), requests that the court extend time to file his brief.

A. Introduction

1. Tevin Willis is the Appellant. The State of Texas is the Appellee (State).

2. Appellant's brief is currently due on July 11, 2016 and Appellant requests an extension until August 10, 2016.

B. Argument and Authorities

3. The court may extend time to file the brief under the authority of Texas Rule of Appellate Procedure 38.6(d). No rule limits the time within which to file this motion to extend. *See* Tex. R. App. P. 38.6(d).

4. Appellant's brief is currently due on July 11, 2016. *See* Tex. R. App. Pro. 38.6(a).

5. Appellant now requests an additional thirty (30) days to file Appellant's brief, extending the time until August 10, 2016.

6. No prior extensions have been granted to Appellant to extend time to file Appellant's Brief.

7. Appellant requests additional time to file his brief because counsel has read the entire appellate record and identified four potential appellate issues. However, the issues are complex and require substantial legal research and drafting, which will require more than the time remaining until the current deadline.

Additionally, Appellant's counsel is currently appellate counsel on the following pending appellate matters:

Mitchell v. State of Texas,
Cause No. 06-15-0196-CR; appeal pending in Sixth Court of Appeals
Jacobs v. State of Texas,
Cause No. 06-16-0008-CR; appeal pending in Sixth Court of Appeals
Parker v. State of Texas,
Cause No. 06-16-00025-CR; appeal pending in Sixth Court of Appeals
Willis v. State of Texas,
Cause No. 06-16-00040-CR; appeal pending in Sixth Court of Appeals
Bledsoe v. State of Texas,
Cause No. 06-16-00044-CR; appeal pending in Sixth Court of Appeals
Feeman, et. al. v. Harleton Oil & Gas, Inc., et al,
Cause No. 06-16-00034-CV; appeal pending in Sixth Court of Appeals
Nard v. State of Texas,
Cause No. 06-16-0040-CR; appeal pending in Sixth Court of Appeals

Accordingly, Appellant's counsel requests an additional thirty days.

C. Prayer

8. For these reasons, Appellant asks the Court to grant an extension of time to file his brief in this cause to August 10, 2016, and for such other and further relief to

which he may be entitled.

Respectfully submitted,

Miller, James, Miller & Hornsby, L.L.P.

By: _____
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Attorneys for Appellant Tevin Willis

CERTIFICATE OF SERVICE

This is to certify that on July 7, 2016, a true and correct copy of the above and foregoing *Appellant's Motion to Extend Time to File the Brief* has been forwarded by U.S. mail on all counsel of record listed below.

Appellant
Tevin Willis
TDC #02069726
Gurney Unit
1385 FM 3328
Palestine, Texas 75803

Trial Court Judge
Honorable Bobby Lockhart
102nd District Judge
Bi-State Justice Building
100 North State Line Avenue
Texarkana, Texas 75501

State's Attorney
Kelley Gossett Crisp
Bowie County Dist. Attorney's Office
601 Main Street
Texarkana, Texas 75501

Defendant's Trial Attorney
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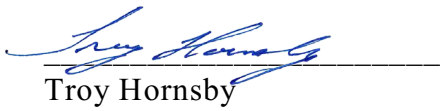

Troy Hornsby