granted PC - 3-4-19

PD-0771-17
COURT OF CRIMINAL APPEALS
AUSTIN, TEXAS
Transmitted 2/22/2019 1:19 PM
Accepted 2/22/2019 2:01 PM
DEANA WILLIAMSON
CLERK

NO. PD-0771-17

IN THE
COURT OF CRIMINAL APPEALS OF TEXAS

FILED
COURT OF CRIMINAL APPEALS
2/22/2019
DEANA WILLIAMSON, CLERK

JOHN CHAMBERS, Petitioner

VS.

THE STATE OF TEXAS, Respondent

On appeal from Cause No. 2015-DCR-268-D from the 103rd Judicial District Court of Cameron County, Texas

Seeking review of the Thirteenth Court of Appeals' Judgment in Cause No. 13-16-00079-CR

MOTION FOR WITHDRAWL OF COUNSEL

LAW OFFICE OF CHAD VAN BRUNT
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ATTORNEYS FOR PETITIONER

TO THE HONORABLE COURT OF CRIMINAL APPEALS:

NOW COME Movants, **GREGORY T. PERKES** and **THE PERKES LAW FIRM, P.C.,** Attorneys for Petitioner, John Chambers, and bring this Motion for Withdrawal of Counsel in the above-referenced cause and in support thereof, would show the Court the following:

I.

Gregory T. Perkes and The Perkes Law Firm, P.C., have good cause to withdraw as counsel because, Mr. Perkes has been recently appointed as a Justice for the 13th Court of Appeals. He is required to close his law practice in its entirety. This withdrawal is not sought for delay.

II.

A copy of this motion is being delivered to Petitioner by regular mail, and certified mail, return receipt requested. Petitioner has been contacted by telephone and is hereby notified in writing of the right to object to this motion. The last known address for Petitioner is:

6 West Henderson Rd
Indian Lake, TX 78566
j.chambers@bordersecurityinvestigations.com

III.

There are no outstanding deadlines.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Movants pray that the Court enter an order discharging Movants, **GREGORY T. PERKES** and **THE PERKES LAW FIRM, P.C.,** as attorneys of record for Petitioner, John Chambers.

Respectfully submitted,

LAW OFFICE OF CHAD VAN BRUNT

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PERKES LAW FIRM, PC

/s/ Gregory T. Perkes

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ATTORNEYS FOR PETITIONER

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion for Withdrawal of Counsel was delivered to Petitioner, John Chambers at the above-referenced address and emailed via e-service to Samuel Katz at samuel.katz@co.cameron.tx.us and to Jennifer Avendano at jennifer.avendano@co.cameron.tx.us.

/s/ Gregory T. Perkes
Gregory T. Perkes