

Application and Affidavit to Take Deposition Testimony

NO. [* ____*]

STATE OF TEXAS

§ **IN THE DISTRICT COURT**

§

vs.

§ **[* ____*] JUDICIAL DISTRICT**

§

DEFENDANT

§ **COLLIN COUNTY, TEXAS**

APPLICATION AND AFFIDAVIT TO TAKE DEPOSITION TESTIMONY

TO THE HONORABLE JUDGE OF SAID COURT:

Now comes DEFENDANT, and files this Application to Take Deposition Testimony pursuant to Article 39.02 of the Texas Code of Criminal Procedure, and in support would show:

1. DEFENDANT desires to have the deposition of [* ____*] taken on [* ____*].
2. As stated in the attached affidavit, there are sufficient facts necessary to constitute a good reason for the taking of the deposition. Specifically:
 - A. [* ____*]
 - B. [* ____*]
 - C. [* ____*]
 - D. [* ____*]
 - E. [* ____*]

WHEREFORE, PREMISES CONSIDERED, DEFENDANT respectfully requests that the Court grant his Application to Take Deposition Testimony.

Respectfully submitted,

Hagerty & Crowder, P.C.

1415 Harroun

McKinney, TX 75069

(972) 359-8400

(972) 359-8402

By:

[* ____*]

State Bar No. [* ____*]

Attorney for DEFENDANT

CERTIFICATE OF SERVICE

This is to certify that on May 21, 2001, a true and correct copy of the above and foregoing document was served on the District Attorney's Office, Collin County, [* ____*], by certified mail, return receipt requested.

[* ____*]