

NO. 0000

STATE OF TEXAS	)	IN THE DISTRICT COURT
VS.	)	226TH JUDICIAL DISTRICT
JOE SMITH	)	BEXAR COUNTY, TEXAS

**APPLICATION TO UNSEAL INFORMATION COLLECTED DURING  
JURY SELECTION PROCESS**

TO THE HONORABLE JUDGE OF SAID COURT:

Joe Smith makes this application to unseal information collected during the jury selection process in his case, pursuant to article 35.29 of the Texas Code of Criminal Procedure, and for good cause, shows the following:

I.

Article 35.29 of the Texas Code of Criminal Procedure provides that information collected during the jury selection process is confidential, but that it may be disclosed on application by a party in the trial on a showing of good cause.

II.

Subsequent to his conviction, defendant retained Mark Stevens for the purpose of determining whether grounds exist for moving for a new trial. Among other things, counsel must investigate possible jury misconduct in violation of Rule 21.3 of the Texas Rules of Appellate Procedure or Rule 606 of the Texas Rules of Evidence. This, of course, requires that counsel attempt to speak to all the jurors who sat in this case. To do so, counsel needs access to the names, telephone numbers and addresses of the jury. This information is contained in the jury list, and the juror information cards, which are presently under seal in

the office of the Bexar County District Clerk.

III.

The need to investigate grounds for a new trial constitutes good cause to unseal the jury list and the juror information cards for the jury in defendant's case.

WHEREFORE, PREMISES CONSIDERED, defendant requests that this Court order the Bexar County District Clerk's Office to unseal the jury list and the juror information cards collected during the jury selection process in defendant's case.

Respectfully submitted:

---

MARK STEVENS  
310 S. St. Mary's Street  
Tower Life Building, Suite 1920  
San Antonio, TX 78205-3192  
(210) 226-1433  
mark@markstevenslaw.com  
State Bar No. 19184200

Attorney for Defendant

**CERTIFICATE OF SERVICE**

I certify that a copy of this Application to Unseal Information Collected During Jury Selection Process has been hand delivered to the Bexar County District Attorney's Office, 101 W. Nueva St., San Antonio, Texas on the 14th day of July, 2018.

---

MARK STEVENS

**ORDER**

On this the \_\_\_\_\_ day of \_\_\_\_\_, 2018, came to be considered defendant's Application to Unseal Information Collected During Jury Selection Process, and it appears to the Court that this Application should be

(GRANTED)

(DENIED)

---

JUDGE PRESIDING