### NO. 000000

STATE OF TEXAS	)	IN THE COUNTY COURT
VS.	)	AT LAW NUMBER EIGHT
JOE SMITH	)	BEXAR COUNTY, TEXAS

# MOTION FOR LEAVE TO TRAVEL FOR BUSINESS PURPOSES WITHIN TEXAS WHILE ON DEFERRED ADJUDICATION COMMUNITY SUPERVISION

## TO THE HONORABLE JUDGE OF SAID COURT:

Joe Smith files this Motion For Leave To Travel For Business Purposes Within Texas While On Deferred Adjudication Community Supervision, and for good cause shows the following:

I.

Mr. Smith was placed on 12 months deferred adjudication community supervision on August 10, 2020 after pleading nolo contendere to the offense of Driving While Intoxicated, first offense.

II.

Mr. Smith is employed in a management position with a local automobile dealership that has branches throughout Texas and the United States. Although travel has been limited since the pandemic commenced, before that time, Mr. Smith was often required to travel outside San Antonio for business meetings, and his employer will expect him to be able to do so again, once travel becomes safe again, and hopefully, soon. By this motion, Mr. Smith seeks leave of Court to travel *within the State of Texas* for business purposes, without having to request specific and advance permission from the Court or the Community Supervision Department before traveling.

#### IV.

Should his employer ask him to travel *outside of Texas*, Mr. Smith will seek permission from his supervising officer, or from this Court before traveling, and will not travel outside the State unless that permission is granted on a case-by-case basis.

V.

Undersigned counsel has conferred with Assistant District Attorney Jeffrey Wright who advises that he has no objection to the request contained in this motion.

WHEREFORE PREMISES CONSIDERED, Joe Smith respectfully requests that he be allowed to travel for business purposes outside Bexar County and anywhere within the State of Texas while on community supervision without first seeking permission to do so from the Court or the Bexar County Adult Community Supervision Department. Respectfully submitted:

MARK STEVENS State Bar No. 19184200 310 S. St. Mary's, Suite 1920 San Antonio, Texas 78205 (210) 226-1433

/s/ Mark Stevens MARK STEVENS

Attorney for Defendant

## **CERTIFICATE OF SERVICE**

I certify that a copy of this Motion For Leave To Travel For Business Purposes Within

Texas While On Deferred Adjudication has been electronically delivered to Assistant District

Jeffrey Wright on August 10, 2020.

<u>/s/ Mark Stevens</u> MARK STEVENS

		NO. 623113	
STATE OF TEXAS		)	IN THE COUNTY COURT
VS.		)	AT LAW NUMBER EIGHT
JOE SMITH		)	BEXAR COUNTY, TEXAS
		ORDER	
On this the	day of		, 2020, came to be considered

Defendant's Motion For Leave To Travel For Business Purposes Within Texas While On Deferred Adjudication, and said Motion is hereby:

(GRANTED) (DENIED)

JUDGE PRESIDING