**CAUSE NO. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**STATE OF TEXAS § IN THE \_\_\_\_\_\_ DISTRICT COURT**

**VS. § OF**

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ § GALVESTON COUNTY, TEXAS**

**AGREED MOTION FOR TEMPORARY PRE-TRIAL RELEASE**

 Comes now, the State of Texas by and through her Criminal District Attorney, Jack Roady, and Defense Counsel, in the above entitled and numbered cause and moves this Court to temporarily release the above Defendant from custody in this case during the pendency of the COVID-19 viral pandemic, and in support thereof would show the following:

 I.

 The Defendant is charged in the above cause with \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.

 The Defendant’s current bond is set at \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. The State has agreed to a temporary release of the Defendant on his personal recognizance bond until such time that the Court orders the Defendant to reappear and turn himself/herself into custody as a condition of his bond. Failure of the Defendant to appear at the Galveston County Jail by the date to be ordered by the Court will result in a warrant for the arrest of the Defendant and the Defendant will be required to post another bond pursuant to Code of Criminal Procedure article 17.09 section 3. II.

 Texas Governor Greg Abbott declared Texas in a State of Disaster on March 13, 2020, and Galveston County Judge Mark Henry placed Galveston County under a local disaster declaration on March 17, 2020. Once the State of Emergency declaration is lifted, the State and Defense are prepared to go forward with this cause, once they have had such an opportunity, on a date as the Court may designate.

 WHEREFORE, PREMISES CONSIDERED, the State and Defense pray that the foregoing Motion for Temporary Release be granted.

Respectfully submitted,

JACK ROADY \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

CRIMINAL DISTRICT ATTORNEY Attorney for the Defendant

GALVESTON COUNTY, TEXAS

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Assistant District Attorney

Criminal District Attorney

Galveston County, Texas

 **CAUSE NO. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**STATE OF TEXAS § IN THE \_\_\_\_\_\_ DISTRICT COURT**

**VS. § OF**

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ § GALVESTON COUNTY, TEXAS**

 **ORDER**

 IT IS HEREBY ORDERED, ADJUDGED, and DECREED that the Defendant be temporarily released on his/her personal recognizance as a condition of his/her bond pursuant to Code of Criminal Procedure article 17.08 section 5, with the condition that he/she return to the Galveston County Jail instanter –on a date to be determined by the Court –to turn himself/herself in.

 Failure to appear at the Galveston County Jail by the date to be ordered by the Court will result in a warrant for the arrest of the Defendant and the Defendant will be required to post another bond pursuant to Code of Criminal Procedure article 17.09 section 3.

 This order is an amendment of the bond and is hereby incorporated therein for all purposes.

 SIGNED on this the \_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, 2020.

 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 JUDGE \_\_\_\_\_\_\_\_ Judicial District Court

 Galveston County, Texas