

CAUSE NO. _____

STATE OF TEXAS	'	IN THE _____ JUDICIAL
	'	
VS.	'	DISTRICT COURT OF
	'	
Defendant	'	TRAVIS COUNTY, TEXAS

EX PARTE MOTION FOR APPOINTMENT OF INVESTIGATOR

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW _____, the Defendant in the above styled and numbered cause and moves the court to appoint an investigator to assist his/her counsel in this case and for cause would show the court as follows:

I.

The Defendant is charged by indictment with the offense of Capital Murder, a Capital degree felony. The Defendant is unable to pay an attorney to represent him in this case.

II.

The court has appointed the undersigned counsel to represent the Defendant in this case. The Defendant also requests that the court appoint **Louis L. Akin, LPI, Texas Investigator's License A10791** as investigator in this case to assist defense Counsel in representing the Defendant. Article 26.05 C.C.P.; Ake vs. Oklahoma, 470 U.S. 68 (1985); Richardson vs. State, 744 S.W.2d 65 (Tex.Crim.App. 1987); Article 1, Sections 10 and 19, Texas Constitution.

WHEREFORE, the Defendant prays that this court appoint Louis L. Akin, licensed and doing business as Akin Investigations as investigator and authorize the payment of up to \$2500 at the rate of fifty dollars per hour (\$50) in fees and for expenses necessarily incurred during the course of business for investigation relating to this case and performed in accordance with defense counsel's instructions.

Respectfully Submitted,

Name

State Bar Number _____

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Austin TX 787

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Attorney for Defendant

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Ex Parte Motion