



V.

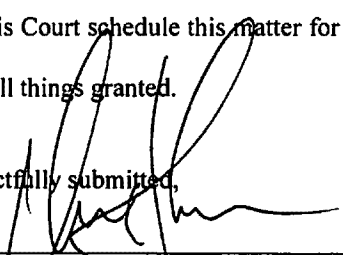
The above described delay is prejudicial to the Defendant in that since the commencement of this action the Defendant has suffered much anxiety and concern regarding the outcome of the trial herein. Further, due to delay caused by the State, the Defendant suffers concerns about spoliation of exculpatory evidence, the loss of exculpatory witnesses, etc.

VI.

Therefore, the Defendant's right to a speedy trial, as guaranteed by the Sixth Amendment of the *United States Constitution*; Art. I, Sec. 10 of the *Texas Constitution*; and Art. 1.05 of the *Texas Code of Criminal Procedure* has been denied and the Defendant is entitled to an immediate and speedy trial in the above entitled and numbered cause.

**WHEREFORE, PREMISES CONSIDERED**, the Defendant respectfully prays that this Honorable Court will grant this, the Defendant's *Constitutional and Statutory Motion for Speedy Trial* in all things; or in the alternative, that this Court schedule this matter for a hearing prior to trial on the merits and that at such hearing this Motion will be in all things granted.

Respectfully submitted,

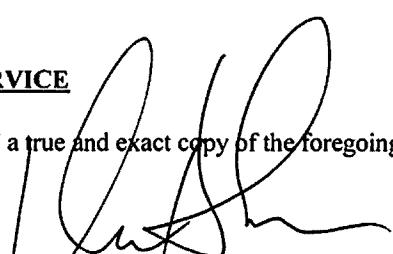
  
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Counsel for Defendant

**FIAT**

IT IS HEREBY ORDERED that the above Motion be heard on the \_\_\_\_\_ day of \_\_\_\_\_, 2017 at \_\_\_\_\_: \_\_\_\_\_:0 o'clock \_\_\_\_\_m.

**CERTIFICATE OF SERVICE**

The undersigned certifies that on June 30, 2017 a true and exact copy of the foregoing was delivered to the office of the Dallas County District Attorney.

  
\_\_\_\_\_  
G. Donald Haslam, Jr.