

**No. 01-24-00519-CR**

In the  
**First Court of Appeals**  
For the  
**State of Texas**

FILED IN  
1st COURT OF APPEALS  
HOUSTON, TEXAS  
2/3/2025 11:31:34 PM  
DEBORAH M. YOUNG  
Clerk of The Court

—◆—  
**Cause No. 1799014**  
In the 486th District Court  
Of Harris County, Texas

—◆—  
**ANGEL ARELLANO**  
*Appellant*  
v.  
**THE STATE OF TEXAS**  
*Appellee*

—◆—  
**APPELLANT'S BRIEF**  
—◆—

**INGER H. CHANDLER**  
Inger H. Chandler, PLLC  
1207 South Shepherd Drive  
Houston, Texas 77019  
Telephone: 713.970.1060  
Facsimile: 713.983.4620  
State Bar Number: 24041051  
inger@ingerchandlerlaw.com

**ATTORNEY FOR APPELLANT**

**ORAL ARGUMENT NOT REQUESTED**

## **STATEMENT REGARDING ORAL ARGUMENT**

Pursuant to TEX. R. APP. P. 38.1(e), Appellee does not request oral argument.

## **IDENTIFICATION OF THE PARTIES**

Pursuant to TEX. R. APP. P. 38.1(a), a complete list of the names of all interested parties is provided below.

Trial Judge:	Honorable Aaron Burdette Presiding Judge, 486 <sup>th</sup> District Court Harris County, Texas
--------------	---

Appellant:	Angel Arellano TDCJ No. 02513606 TDCJ – Wynne Unit 810 F.M. 2821 Huntsville, Texas 77349
------------	--

Counsel for Appellant:	Inger H. Chandler 1207 South Shepherd Drive Houston, Texas 77019
------------------------	--

Trial Counsel for Appellant:	Joseph Varela Attorney at Law P.O. Box 924136 Houston, Texas 77292
------------------------------	---

Appellate Counsel for the State:	Jessica Caird Harris Co. District Attorney's Office 1201 Franklin Street, Suite 600 Houston, Texas 77002
----------------------------------	---

Trial Counsel for the State:

Rebekah Wrobleske  
Harris Co. District Attorney's Office  
1201 Franklin Street, Suite 600  
Houston, Texas 77002

Nicholas Toups  
Harris Co. District Attorney's Office  
1201 Franklin Street, Suite 600  
Houston, Texas 77002

## **TABLE OF CONTENTS**

STATEMENT REGARDING ORAL ARGUMENT.....	i
IDENTIFICATION OF THE PARTIES .....	i
TABLE OF CONTENTS .....	iii
INDEX OF AUTHORITIES .....	iv
STATEMENT OF THE CASE .....	1
ISSUE PRESENTED .....	1
STATEMENT OF FACTS.....	2
SUMMARY OF THE ARGUMENT.....	3
APPELLANT’S SOLE POINT OF ERROR .....	3
<i>The trial court abused its discretion in denying Appellant’s motion for mistrial after the prosecutor’s improper jury argument. ....</i>	<i>3</i>
CONCLUSION & PRAYER .....	17
CERTIFICATE OF SERVICE .....	18
CERTIFICATE OF COMPLIANCE .....	19

## INDEX OF AUTHORITIES

### CASES

<i>Barshaw v. State</i> , 342 S.W.3d 91 (Tex.Crim.App. 2011) .....	6
<i>Beltran v. State</i> , 760 S.W.2d 353 (Tex.App.—Houston [1st District] 1988, pet ref'd) .....	10
<i>Borjan v. State</i> , 787 S.W.2d 53 (Tex.Crim.App. 1990)(per curiam) .....	4, 8
<i>Campbell v. State</i> , 610 S.W.2d 754 (Tex.Crim.App. [Panel Op.] 1980) ...	5
<i>Coble v. State</i> , 871 S.W.2d 192 (Tex.Crim.App. 1993) .....	12
<i>Cockrell v. State</i> , 933 S.W.2d 73 (Tex.Crim.App. 1996) .....	6
<i>Cortez v. State</i> , 683 S.W.2d 419 (Tex.Crim.App. 1984) .....	8
<i>Davis v. State</i> , 329 S.W.3d 798 (Tex.Crim.App. 2010) .....	6
<i>Dinkins v. State</i> , 894 S.W.2d 330 (Tex.Crim.App. 1995) .....	14
<i>Freeman v. State</i> , 340 S.W.3d 717 (Tex.Crim.App. 2011) .....	5
<i>Gonzales v. State</i> , 807 S.W.2d 830 (Tex.App.—Houston [1st Dist.] 1991, pet. ref'd) .....	7
<i>Lee v. State</i> , 176 S.W.3d 452 (Tex.App.-Houston [1st Dist.] 2004) .....	15
<i>Livingston v. State</i> , 531 S.W.2d 821 (Tex.Crim.App. 1976) .....	10
<i>Martines v. State</i> , 371 S.W.3d 232 (Tex.App.-Houston [1st Dist.] 2011, no pet.) .....	15
<i>Martinez v. State</i> , 17 S.W.3d 677 (Tex.Crim.App. 2000) .....	11
<i>Martinez v. State</i> , 178 S.W.3d 806 (Tex.Crim.App.2005) .....	15
<i>Milton v. State</i> , 572 S.W.3d 234 (Tex.Crim.App. 2019) .....	5
<i>Mosley v. State</i> , 983 S.W.2d 249 (Tex.Crim.App. 1998) .....	11, 12
<i>Norris v. State</i> , 902 S.W.2d 428 (Tex.Crim.App. 1995) .....	14
<i>Snowden v. State</i> , 353 S.W.3d 815 (Tex.Crim.App. 2011) .....	14
<i>Tear v. State</i> , 74 S.W.3d 555 (Tex.App.-Dallas 2002, pet. ref'd) .....	16
<i>Thomas v. State</i> , 505 S.W.3d 916 (Tex.Crim.App. 2016) .....	6
<i>Wesbrook v. State</i> , 29 S.W.3d 103 (Tex.Crim.App. 2000) .....	7

## STATUTES

TEX. CODE CRIM. PROC. ANN. art. 38.07 (West Supp. 2017).....	15
--	----

## RULES

TEX. R. APP. P. 38.1(e).....	i
TEX. R. APP. P. 38.2(a)(1)(A) .....	i
TEX. R. APP. P. 44.2(b) .....	6, 11
TEX. R. APP. P. 9.4(e).....	19
TEX. R. APP. P. 9.4(i) .....	19

## **TO THE HONORABLE FIRST COURT OF APPEALS:**

### **STATEMENT OF THE CASE**

On August 1, 2023, Appellant was charged by indictment with the felony offense of aggravated sexual assault of a child. (CR 68). A jury was selected on June 21, 2024, and sworn on June 24, 2024. (CR 215-23; 2RR 3-173; 3RR 17). On June 26, 2024, the jury found Appellant guilty as charged in the indictment and the trial court assessed punishment at confinement in the Texas Department of Criminal Justice—Institutional Division for a period of thirty (30) years. (CR 234, 237-40; 5RR 36; 6RR 13). That same day, the trial court certified Appellant’s right to appeal and Appellant filed timely notice of appeal. (CR 236, 242-43).

---

### **ISSUE PRESENTED**

Did the trial court abuse its discretion in denying Appellant’s motion for mistrial after the prosecutor’s improper jury argument?

---

## **STATEMENT OF FACTS**

In July 2021, twelve-year-old A.A. spent a week with her father, Appellant, at his residence in Houston.<sup>1</sup> (3RR 48-56, 67, 139-40, 179). A few weeks after her return home to El Paso, A.A. made outcry to her mother, Esly Garcia (“Garcia”), that Appellant sexually assaulted her during their visit. (3RR 57-61, 176-77). Garcia reported the allegation to the police and an investigation was initiated by the Harris County Sheriff’s Office. (3RR 61-62, 70-81). In late August 2021, in El Paso, A.A. was taken for a non-acute SANE examination and forensic interview. (3RR 61, 79-80, 177-78, 181-83; 4RR 18). The medical exam revealed “vaginal notches” that gave nurse Deenayy McDaniel (“McDaniel”) “concerns of penetration.” (3RR 126-31).

At trial, A.A. testified that on her last night in Houston, at Appellant’s residence (an RV), Appellant sexually assaulted her by penetrating her vagina with his penis and performing oral sex on her. (3RR 145-59). A.A. further testified that the following day, approximately four hours outside of El Paso, Appellant parked on the

---

<sup>1</sup> Aliases are used for the complainant and other witnesses who were minors at the time of the offense. TEX. R. APP. P. 9.10



side of the highway and engaged in vaginal intercourse with her a second time. (3RR 160-74; 4RR 16-17).

Appellant did not present any evidence during the guilt-innocence or punishment phases of trial. (4RR 97; 6RR 8).



### **SUMMARY OF THE ARGUMENT**

Sole Point of Error: The trial court abused its discretion in denying Appellant's motion for mistrial after the prosecutor's improper jury argument. Accordingly, Appellant's conviction for aggravated sexual assault of a child should be reversed and his case remanded for a new trial.



### **APPELLANT'S SOLE POINT OF ERROR**

The trial court abused its discretion in denying Appellant's motion for mistrial after the prosecutor's improper jury argument.

*"If you find him not guilty, if you let this man walk out those doors, he won't stop. He's going to do this again. There will be another victim.*

*And next time, he's going to get away with it because we just taught him how. Next time he won't have the brave victim that we had in this trial or maybe we won't have the injuries*

*we had in this trial. He's going to find a more submissive child that he can successfully manipulate to not say anything.*

*My question to you is: How many victims does he have to assault, does he have to rape? How many children does he have to take their innocence from? How many victims do I have to put on the stand before we hold him accountable for what he's doing to the kids in our community, for what he did to [A.A.], his own daughter. Because you better believe if he can do it to his own daughter, he can do it to anyone.*

*If you let him walk out those doors, he's going to get on the elevator with you, he's going to go out into our community, he is going to do it again. He won't have a sign on his back saying: I like to rape children. The only people who would know what he's capable of is you 12 right here. Don't let him walk out those doors. Don't let him get away with putting his penis in his 12-year-old daughter's vagina and raping her repeatedly. Don't let him do it to another kid. If you find him not guilty, you're telling the children of our community that we don't care who –*

*\* \* \**

*Tell [A.A.] that you believe her, that we stand up for children. Hold him accountable for raping his 12-year-old daughter. Don't let him do this again. Find him guilty of raping his 12-year-old daughter.”*

(5RR 27-29)(sic).

The law provides for, and presumes, a fair trial, free from improper argument by the State. *Borjan v. State*, 787 S.W.2d 53, 56 (Tex.Crim.App. 1990)(per curiam).

The purpose of closing argument is to facilitate the jury in properly analyzing the evidence presented at trial so that it may “arrive at a just and reasonable conclusion based on the evidence alone, and not on any fact not admitted in evidence.” *Milton v. State*, 572 S.W.3d 234, 239 (Tex.Crim.App. 2019)(quoting *Campbell v. State*, 610 S.W.2d 754, 756 (Tex.Crim.App. [Panel Op.] 1980). Argument should not arouse the passion or prejudice of the jury by matters not properly before them. *Id.* In general, the four proper areas of jury argument are: (1) summation of the evidence; (2) reasonable deductions from the evidence; (3) answers to opposing counsel's argument; and (4) pleas for law enforcement. *Freeman v. State*, 340 S.W.3d 717, 727 (Tex.Crim.App. 2011).

The prosecutor’s repeated and emphatic argument that Appellant had committed crimes against other children and, if not convicted, would commit future crimes against other children, was wholly unsupported by the evidence and served only to inflame the jury and scare them into a guilty verdict.

## **STANDARD OF REVIEW**

A trial court's ruling on an objection to improper jury argument is reviewed for an abuse of discretion. *See Davis v. State*, 329 S.W.3d 798, 825 (Tex.Crim.App. 2010). .

Because improper jury arguments are considered nonconstitutional error, they will be disregarded unless they affect a defendant's substantial rights. TEX. R. APP. P. 44.2(b); *Barshaw v. State*, 342 S.W.3d 91, 93 (Tex.Crim.App. 2011). A substantial right is affected when the error had a substantial and injurious effect or influence in determining the jury's verdict. *Thomas v. State*, 505 S.W.3d 916, 926 (Tex.Crim.App. 2016).

## **PRESERVED ERROR**

Error is preserved when trial counsel objects to a prosecutor's improper argument and pursues said objection to an adverse ruling. *See Cockrell v. State*, 933 S.W.2d 73, 89 (Tex.Crim.App. 1996).

Trial counsel objected during the prosecutor's improper jury argument. (5RR 28-29). Preserved error is reversible if the argument was extreme, manifestly improper, violative of a mandatory statute or injected harmful new facts into the proceeding to the extent that the

instruction was meaningless. *See Westbrook v. State*, 29 S.W.3d 103, 115 (Tex.Crim.App. 2000); *Gonzales v. State*, 807 S.W.2d 830, 835 (Tex.App.—Houston [1st Dist.] 1991, pet. ref'd).

If this Court determines that trial counsel's objection did not preserve error for *each* of the improper comments made by the prosecutor, this unpreserved error is still reversible if the argument was so manifestly improper that an instruction would not have cured the harm. *Gonzales*, 807 S.W.2d at 835.

#### **THE PROSECUTOR'S ARGUMENT WAS IMPROPER**

The prosecutor's case was circumstantial, as these types of cases often are. The evidence primarily consisted of 1) the complainant's accusation and outcry, and 2) evidence of "vaginal notches" that raised concern of, but could not conclusively establish, vaginal penetration. Trial counsel thoroughly examined the State's witnesses and was able to elicit and highlight inconsistencies and potential areas for doubt in the evidence. During deliberations, the jury requested readback of specific testimony regarding A.A.'s outcry to her mother. (CR 224, 235; 5RR 31-34).

A prosecutor may not use closing arguments to present evidence that is outside the record. Improper references to facts that are neither in evidence nor inferable from the evidence are generally designed to arouse the passion and prejudice of the jury and, as such, are inappropriate. *Borjan*, 787 S.W.2d at 57. A prosecutorial argument is improper if it induces the jury to reach a particular verdict based upon the demands, desires, or expectations of the community. *See Cortez v. State*, 683 S.W.2d 419, 421 (Tex.Crim.App. 1984)(holding improper the argument, “Now, the only punishment that you can assess that would be any satisfaction at all to the people of this county would be life.”).

During her closing argument, the prosecutor not only accused Appellant of committing sexual abuse against children other than A.A., but also stated *matter-of-factly* that he would commit future acts of sexual abuse against other children in the community:

- *If you find him not guilty ... he won't stop.*
- *He's going to do this again.*
- *There will be another victim.*
- *He'll get away with it next time because [a not guilty verdict] just taught him how.*
- *He's going to find a more submissive child.*

- *How many victims does he have to assault, does he have to rape?*
- *How many children does he have to take their innocence from?*
- *How many victims do I have to put on the stand?*
- *If he can do it to his own daughter, he can do it to anyone.*
- *If you let him walk out that door he's going to get on the elevator with you, he's going to go out into our community, he's going to do it again.*
- *He won't have a sign on his back saying, "I like to rape children."*
- *Don't let him do it to another kid.*
- *If you find him not guilty, you are telling the children of our community that we don't care who –*

(5RR 28-29).

Trial counsel objected to improper argument and the trial court sustained the objection. (5RR 28). Trial counsel requested an instruction to the jury to disregard the statement(s); the trial court instructed the jury to disregard the last comment by the prosecutor. (5RR 29). Trial counsel's motion for mistrial was denied. (5RR 29). The prosecutor then doubled-down with her final remarks:

*Tell [A.A.] that you believe her, that we stand up for children. Hold him accountable for raping his 12-year-old daughter. Don't let him do this again.*

(5RR 29)(emphasis added).

It's not uncommon for prosecutors to employ the strategy of warning jurors that a not guilty verdict will result in the defendant "riding down the elevator" with them after trial. The Texas Courts of Appeals and the Texas Court of Criminal Appeals have found it to be a permissible deduction from the evidence and a proper plea for law enforcement, so long as the prosecutor does not suggest the defendant will commit future crimes if not convicted. See *Beltran v. State*, 760 S.W.2d 353, 356 (Tex.App.—Houston [1st District] 1988, pet ref'd)(holding improper a prosecutor's remark that a verdict of "not guilty" would allow the defendant to "ride down the elevator with you to rape other children"). Here, the prosecutor did the very thing proscribed by *Beltran*: she told the jury unequivocally that if acquitted, Appellant would commit future crimes. See also *Livingston v. State*, 531 S.W.2d 821, 823 (Tex.Crim.App. 1976)(concluding that prosecutor's argument was improper when it suggested that if a DWI defendant were to remain at large, he "may very well go out and kill somebody").



Further, the prosecutor's argument cannot be excused as a summation of the evidence or reasonable deduction of the evidence. There is no evidence in the record that Appellant had ever been accused of sexually abusing other children, or that the abuse alleged by A.A. had occurred on any other occasion. There was no testimony from extraneous victims, there was no evidence offered of extraneous crimes or bad acts, there was no expert opinion offered that Appellant was a serial abuser or that he had a high risk of recidivism. The prosecutor's argument had no basis in truth or evidence; rather, it was conjured to strike fear into the hearts and minds of the jurors to ensure they would find Appellant guilty.

### **HARM ANALYSIS**

Improper jury argument is generally considered nonconstitutional error. *Martinez v. State*, 17 S.W.3d 677, 692 (Tex.Crim.App. 2000)(citing the holding in *Mosley v. State*, 983 S.W.2d 249 (Tex.Crim.App. 1998) for the proposition "that most comments that fall outside the areas of permissible argument will be considered to be error of the nonconstitutional variety"). Nonconstitutional error is disregarded unless it affects substantial rights. TEX. R. APP. P. 44.2(b).

Determining whether an improper jury argument is harmful requires balancing three factors: (1) severity of the misconduct (the magnitude of the prejudicial effect of the prosecutor's remarks), (2) measures adopted to cure the misconduct (the efficacy of any cautionary instruction by the judge), and (3) the certainty of conviction absent the misconduct (the strength of the evidence supporting the conviction).. *Mosley*, 983 S.W.2d at 259 (Tex.Crim.App. 1998).

*Prejudicial Magnitude of Misconduct*

The improper argument in this case was not inconsequential. It was not a slip of the tongue in the heat of battle. It was not a speculative list of potential, harmful consequences. *See Coble v. State*, 871 S.W.2d 192, 206 (Tex.Crim.App. 1993)(improper argument not harmful where prosecutor did not emphasize issue or refer to it again). It was a targeted, two-fold message, repeated again and again and again: the Appellant has done this before, and he will do it again.

It is almost an anomaly – a child sexual abuse case that does not have extraneous bad acts, extraneous allegations, extraneous victims. In many of these cases, the argument that “past behavior predicts future behavior” may very well be proper. But that is only when the argument

is supported by evidence or is a reasonable deduction therefrom. Here, the allegation was singular in nature as to timeframe. There were no allegations by A.A. that Appellant had ever sexually abused her in the past. No witness or evidence was produced that suggested Appellant had sexually abused other children. The absence of extraneous evidence does not make the allegations in Appellant's case any less egregious, but it places limits on what the prosecutor can argue.

It is difficult to imagine anything more impactful to a jury than an unqualified statement that an accused child sexual abuser is a predator with past and future victims. Nothing could be more frightening to a jury than the idea that if they do not believe the State has proven its case beyond a reasonable doubt, their acquittal will "teach" the Appellant how to abuse other children in the future.

The magnitude of the State's improper argument was large – in its implication, its repetition, and its fearmongering.

#### *Efficacy of Curative Measures*

Improper jury arguments are generally cured by an instruction to disregard. *See Dinkins v. State*, 894 S.W.2d 330, 357 (Tex.Crim.App.

1995). Here, the timing and repetitive nature of the arguments diminished the instruction's efficacy.

The prosecutor's improper jury arguments were made during her second closing. They were the last words the jury heard before retiring for deliberations. In *Norris v. State*, 902 S.W.2d 428, 443 (Tex.Crim.App. 1995), the Texas Court of Criminal Appeals acknowledged the impact of improper closing jury arguments at this stage of trial, noting that, "an instruction to disregard may be insufficient to remove the prejudice of some such arguments." *Id.* The recency and primacy effect underscores this concern: the last arguments made are the ones the jury remembered the most.

Further, the prosecutor's references to past and future acts of sexual abuse by the Appellant were impassioned and repetitive. See *Snowden v. State*, 353 S.W.3d 815, 822 (Tex.Crim.App. 2011)(finding relevant how emphatically the prosecutor invited the jury to consider the improper argument, whether the improper argument was repeated, and how much heft the jury would likely have placed upon the improper argument in light of the weight and character of the evidence). A plea for law enforcement and community safety is an understandable strategy

in a case involving a child victim, but it cannot stand when it impermissibly injects facts – particularly unsubstantiated, extraneous accusations – that are outside of the record.

*Certainty of Conviction*

Finally, the certainty of a conviction absent an improper jury argument is highly speculative. It is impossible to know whether the jury would have convicted the Appellant had the prosecutor's improper jury arguments not been made.

The law is clear that the uncorroborated testimony of a complainant is sufficient to support a conviction for aggravated sexual assault of a child. See TEX. CODE CRIM. PROC. ANN. art. 38.07 (West Supp. 2017); *Martinez v. State*, 178 S.W.3d 806, 814 (Tex.Crim.App.2005)(noting that article 38.07 “deals with the *sufficiency* of evidence required to sustain a conviction for” certain sexual offenses)(emphasis in original). The State has no burden to produce any corroborating or physical evidence. *Martines v. State*, 371 S.W.3d 232, 240 (Tex.App.-Houston [1st Dist.] 2011, no pet.); see also *Lee v. State*, 176 S.W.3d 452, 458 (Tex.App.-Houston [1st Dist.] 2004) (holding that medical or physical evidence is not required to corroborate child victim's testimony), *aff'd*, 206 S.W.3d

620 (Tex.Crim.App.2006). Likewise, a child victim's outcry statement alone can be sufficient to support a sexual abuse conviction. *See Tear v. State*, 74 S.W.3d 555, 560 (Tex.App.-Dallas 2002, pet. ref'd).

Appellant cannot and does not argue that the evidence presented in his trial was not objectively sufficient to support a conviction absent the improper jury argument. However, the subjective impact of the prosecutor's improper argument cannot be overstated, nor should it be speculated. The jury was presented with less than four hours of testimony and evidence. (CR 251-52). The evidence included A.A.'s testimony, her outcry to her mother, and medical evidence that raised concerns for – but could not definitively corroborate – penetration. The jury identified a dispute in their deliberations regarding the testimony of A.A. and her mother and requested readback from the trial court. (CR 224, 235; 5RR 31-34). They deliberated for two-and-a-half hours before returning a guilty verdict. (CR 252).

In assessing the harm suffered by Appellant due to the prosecutor's improper jury argument, two factors – the severity of the misconduct and the efficacy of the instruction to disregard – heavily favor the Appellant. The certainty of Appellant's conviction cannot be speculated due to the

inflammatory nature of the prosecutor's arguments. As such, the trial court should have granted Appellant's motion for mistrial.

### **CONCLUSION & PRAYER**

It is respectfully submitted that the trial court abused its discretion in denying Appellant's motion for mistrial after the prosecutor's improper jury argument; accordingly, Appellant's conviction should be reversed, and the case remanded for a new trial.

Respectfully submitted,

/s/ Inger H. Chandler  
**INGER H. CHANDLER**  
Inger H. Chandler, PLLC  
1207 South Shepherd Drive  
Houston, Texas 77019  
Telephone: 713.970.1060  
Facsimile: 713.983.4620  
State Bar Number: 24041051  
inger@ingerchandlerlaw.com

ATTORNEY FOR APPELLANT

**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing instrument has been delivered to the Harris County District Attorney's Office via e-filing on February 3, 2025.

/s/ Inger H. Chandler  
**INGER H. CHANDLER**



## **CERTIFICATE OF COMPLIANCE**

This is to certify that this brief complies with the typeface requirements of TEX. R. APP. P. 9.4(e) because it has been prepared in a conventional typeface no smaller than 14-point for text and 12-point for footnotes. This document also complies with the word-count limitations of TEX. R. APP. P. 9.4(i), if applicable, because it contains 3,792 words according to the word count on Microsoft Word.

/s/ Inger H. Chandler  
**INGER H. CHANDLER**

### **Automated Certificate of eService**

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Inger Chandler on behalf of Inger Chandler

Bar No. 24041051

inger@ingerchandlerlaw.com

Envelope ID: 96938438

Filing Code Description: Brief Not Requesting Oral Argument

Filing Description: Appellant's Brief

Status as of 2/4/2025 7:52 AM CST

#### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Jessica Caird	24000608	caird_jessica@dao.hctx.net	2/3/2025 11:31:34 PM	SENT
ADA Harris County		DAOEService@dao.hctx.net	2/3/2025 11:31:34 PM	SENT