

No. NM 190020

2013 JUN 10 AM 11:35
CLERK OF COURT
GERARD KIRKPATRICK
COUNTY CLERK DEPT. OF
14

THE STATE OF TEXAS

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IN THE COUNTY COURT

VS.

son

AT LAW NO. 14

TRAVIS RANDOLP GOTTHARDT

202

BEXAR COUNTY, TEXAS

**MOTION FOR APPOINTMENT OF A CRIMINAL DISTRICT
ATTORNEY *PRO TEM* PURSUANT TO ARTICLE 2.07,
TEXAS CODE OF CRIMINAL PROCEDURE**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Susan D. Reed, Criminal District Attorney of Bexar County, Texas,
and would respectfully move this Court to appoint a Criminal District Attorney Pro Tem in
the above-styled cause. In support of said Motion, undersigned counsel would show unto
the Court the following:

I.

TRAVIS RANDOLPH GOTTHARDT, Defendant, is the son of an employee of the Bexar County Criminal District Attorney's Office.

II.

The Texas Code of Criminal Procedure Article 2.07 provides the following:

- (a) Whenever an attorney for the state is disqualified to act in any case or proceeding, is absent from the county or district, or is otherwise unable to perform the duties of his office, or in any instance where there is no attorney for the state, the judge of the court in which he represents the state may appoint any competent attorney to perform the duties of the office during the absence or disqualification of the attorney for the state.**

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- (b-1) An attorney for the state who is not disqualified to act may request the court to permit him to recuse himself in a case for good cause and upon approval by the court is disqualified.**

* * * * *

- (d) In this article, "attorney for the state" means a county attorney, a district attorney, or a criminal district attorney.
- (f) In subsection (a) of this article, "competent attorney" includes an assistant attorney general.

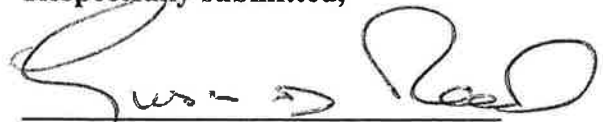
TEX. CODE CRIM. PROC. ANN. art. 2.07 (Vernon 1977).

III.

Under the circumstances, undersigned counsel recuses herself from this matter and requests the Court appoint the Texas Attorney General's Office, an elected prosecutor from another Texas County or an Attorney who does not practice criminal defense law in Bexar County, Texas, as attorney *pro tem*.

WHEREFORE, PREMISES CONSIDERED, counsel for the State would request this Court to grant this motion.

Respectfully submitted,



SUSAN D. REED
Criminal District Attorney
Bexar County, Texas
Bexar County Justice Center
101 W. Nueva
San Antonio, Texas 78205-3030
(210) 335-2342
State Bar No. 16687400

CERTIFICATE OF SERVICE

I, SUSAN D. REED, Criminal District Attorney, Bexar County Texas, hereby
certify that a true copy of the above and foregoing Motion For Appointment of a Criminal
District Attorney Pro Tem was served on the defendant's attorney of record, _____, on
this 10 day of JUNE, A.D., 2013, by certified mail, return receipt
requested addressed as follows: 280 DRESDEN WOOD DR.

BOENKE TX 78206.

for Jim P. [Signature]
SUSAN D. REED