

THE STATE OF TEXAS

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IN THE DISTRICT COURT
OF ELLIS COUNTY TEXAS
ELIAS REED
DISTRICT CLERK
ELLIS COUNTY, TX

VS.

JOHN ERIC ARMSTRONG

443rd JUDICIAL DISTRICT

REQUEST FOR HEARING ON APPLICATION FOR DEPOSITION
OF WITNESS JOHNNY REECE

TO THE HONORABLE JUDGE OF SAID COURT:


COMES NOW THE DEFENDANT, John Eric Armstrong (“Armstrong”) and hereby files Request for Hearing on Application for Deposition of Witness Johnny Reece.

1. Armstrong has filed an APPLICATION FOR DEPOSITION OF JOHNNY REECE with an AFFIDAVIT. The DA was served with a copy.

2. On the filing of the affidavit and application, and after notice to the opposing party, the court shall hear the application and determine if good reason exists for taking the deposition.

3. WHEREFORE, the Defendant respectfully urges this Court to grant this MOTION; schedule the required hearing; and grant such other relief as the Court feels is appropriate.

This 29 day of July, 2021,

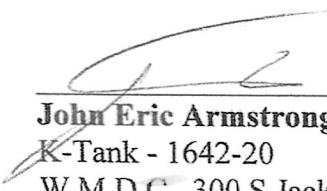


John Eric Armstrong
K-Tank -- 1642-20
W.M.D.C.
300 S Jackson, Waxahachie, TX 75165

54. I have not had access to the evidence in this case while incarcerated, so I may have additional areas of inquiry after I review evidence.

55. I ask this Court to grant this Application and authorize a deposition of Reece.

This 29 day of July, 2021,



John Eric Armstrong

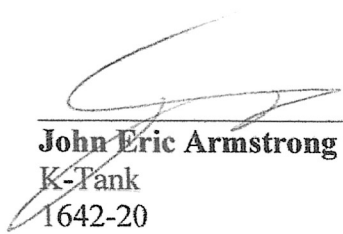
K-Tank - 1642-20

W.M.D.C., 300 S Jackson, Waxahachie, TX 75165

DECLARATION

My name is John Eric Armstrong. My date of birth is October 31, 1981, and my inmate identifying number is 1642-20. I am presently incarcerated in W.M.D.C., 300 S Jackson, Waxahachie, TX 75165. I declare under penalty of perjury that the foregoing is true and correct and based upon my personal knowledge, except as to the matters herein stated to be alleged on information and belief, and that as to those matters, I believe them to be true.

Executed in Ellis County, State of Texas, on the 29 day of July, 2021.



John Eric Armstrong

K-Tank

1642-20

W.M.D.C.

300 S Jackson

Waxahachie, TX 75165