

EMERGENCY MOTION FOR STAY OF TRIAL COURT PROCEEDINGS

CAUSE NO. 05-25-00731-CR

IN THE COURT OF APPEALS, FIFTH DISTRICT OF TEXAS AT DALLAS

FILED IN
5th COURT OF APPEALS
DALLAS, TEXAS
6/23/2025 6:27:36 AM

Alexis Lorene Landrum, Appellant

v.

State of Texas, appellee

Ruben Morin
Clerk

EMERGENCY MOTION FOR STAY OF TRIAL COURT PROCEEDINGS

TO THE HONORABLE JUSTICES OF THE COURT OF APPEALS:

Appellant, Alexis Lorene Landrum, files this Emergency Motion for Stay of Trial Court Proceedings in Cause No. 380-83365-2018, scheduled for June 23, 2025, at 9:00 AM in the 296th District Court, Collin County, Texas, and respectfully shows:

1. Introduction:

- a. petitioner seeks a stay of the June 23, 2025, Motion to Adjudicate (MTA) hearing due to the trial court's lack of jurisdiction, failure to provide notice or an amended MTA, coerced plea process, and denial of appellate counsel, as detailed in the concurrently filed Original Petition for Writ of Mandamus and Notice of Appeal.

2. Factual Background:

- a. On October 23, 2024, the trial court issued a signed order dismissing Cause No. 380-83365-2018, terminating jurisdiction (Exhibit 1: Certified Dismissal Order).
- b. Post-October 23, 2024, the court vacated the dismissal via an unsigned docket entry without notice or hearing, (Exhibit 2: Docket Entry; Exhibit 3: Affidavit of No Service).
- c. petitioner was detained for 67 days (December 2, 2024 – February 8, 2025) without a magistrate hearing, violating Tex. Code Crim. Proc. Arts. 15.17, 1.051 (Exhibit 4: Detention Records).
- d. On May 19, 2025, the trial court coerced petitioner to plead "true" to unspecified allegations via a pass slip lacking plea terms, which petitioner signed "not true" (Exhibit 10 Pass Slip)
- e. No amended MTA was provided, and appellate counsel was denied Exhibit 7 and 9 June 18, 2025 Transcript).
- f. motions filed March 19–20, 2025, remain unrul

3. Grounds for Stay:

- a. **Lack of Jurisdiction:** The trial court lost jurisdiction after the October 23, 2024, dismissal (Exhibit 1; Tex. Code Crim. Proc. Art. 42A.103(a); *Ex parte White*, 506 S.W.3d 39 (Tex. Crim. App. 2016)).

- b. **Due Process Violations:** No notice, hearing, or amended MTA was provided, and the plea process was coercive (Exhibits 2, 4, 13, O; *Mullane v. Central Hanover Bank*, 339 U.S. 306 (1950); *Boykin v. Alabama*, 395 U.S. 238 (1969)).
 - c. **Sixth Amendment Violations:** Denial of appellate counsel and ineffective assistance by Maria Tu prejudice petitioner (Exhibits 10, 13, 14, O; *Gideon v. Wainwright*, 372 U.S. 335 (1963); *Strickland v. Washington*, 466 U.S. 668 (1984)).
 - d. **Irreparable Harm:** Proceeding without a stay risks unlawful detention, probation, or adjudication, causing financial loss (\$6,000) and distress (Exhibit 12 Affidavit).
4. **Legal Authority:**
- a. This Court may stay trial court proceedings to preserve jurisdiction and prevent harm pending mandamus or appeal (Tex. R. App. P. 52.10; *In re Prudential Ins. Co.*, 148 S.W.3d 124 (Tex. 2004)).
5. **Prayer for Relief:**
- a. petitioner respectfully requests:
 - a. An emergency stay of the June 23, 2025, hearing and all proceedings in Cause No. 380-83365-2018.
 - b. Expedited consideration due to the imminent hearing.
 - c. Further relief as deemed just.

Respectfully submitted,

/s/ Alexis Lorene Landrum
Alexis Lorene Landrum, Pro Se

517 W. Owing St.,

Denison Tx 75020
alexislandrum16@gmail.com

June 22, 2025

Certificate of Service: I certify that on June 22, 2025, a true copy of this motion was served via e-file on the Collin County District Attorney's Office, 2100 Bloomdale Rd., McKinney, TX 75071,

/s/ Alexis Lorene Landrum

Exhibit 1:

Description: Certified copy of the signed order dismissing Cause No.

380-83365-2018 on October 23, 2024, terminating the trial court's jurisdiction.

Purpose: Supports the claim of lack of jurisdiction post-dismissal (Tex. Code Crim. Proc. Art. 42A.103(a); *Ex parte White*, 506 S.W.3d 39).

CASE NO.
380-83365-2018

THE STATE OF TEXAS § IN THE
§
v. § 296th District Court
§ Honorable Roach, J Jr.
Alexis Lorene Landrum § Collin County, Texas

**ORDER OF EARLY DISCHARGE FROM COMMUNITY SUPERVISION
(PROBATION)**

The Court hereby reduces or terminates Defendant's original period of community supervision (hereinafter "probation") and finds that the period of probation has expired. The Court further finds that Defendant has satisfactorily fulfilled the conditions of probation.

Accordingly, the Court hereby **ORDERS**:

- ☒ Defendant discharged from probation; or
- ☐ Defendant discharged from probation. The Court **FURTHER ORDERS** that the Defendant's plea be withdrawn and the verdict be set aside. The Court **FURTHER ORDERS** that the accusation, complaint, information, or indictment be dismissed, and that the Defendant be released from all penalties and disabilities resulting from the conviction or plea in the case, except that (1) proof of the Defendant's conviction or plea shall be made known to the judge if the Defendant is convicted of any subsequent offense, and (2) if the Defendant is an applicant for or the holder of a license issued by the Department of Family and Protective Services (hereinafter "Department"), the Department may consider the fact that the Defendant previously received probation in issuing, renewing, denying, or revoking a license under Chapter 42, Human Resources Code.

Signed and Entered on
10/23/2024

Filed: October 24, 2024 11:06 AM
Michael Gould
District Clerk
Collin County, Texas
By: Bese, Jaime Deputy

JUDGE PRESIDING

THIS FORM DOES NOT REPLACE THE CRIMINAL JUSTICE INFORMATION SYSTEM (CJIS) REPORTING FORM OR THE CURRENT ELECTRONIC REPORTING THAT A CLERK OF THE COURT MAY USE IN REPORTING INFORMATION TO THE TEXAS DEPARTMENT OF PUBLIC SAFETY.

OFFICE OF COURT ADMINISTRATION STANDARDIZED FORM

FOR USE IN DISCHARGING A DEFENDANT FROM COMMUNITY SUPERVISION UNDER ARTICLE 42A.701, CCP
2018

JANUARY

Exhibit 2:

Description: Unsigned docket entry reflecting the trial court's vacatur of the October 23, 2024, dismissal without notice or hearing.

Purpose: Evidence of due process violation due to lack of notification

3/26/25, 8:59 AM

cijspub.co.collin.tx.us/SecurePA/CaseDetail.aspx?CaseID=1769878

07/19/2018 Approving Bond by Sheriff
10/04/2018 Case Filed by Indictment (OCA)
10/09/2018 TFDA Indigent Packet - Attorney Appointment Eligible
10/09/2018 Notice to Appear Issued
10/09/2018 Letter of Representation
10/26/2018 First Appearance (9:00 AM) (Judicial Officer Smith, Benjamin N.)
11/08/2018 Status (1:00 PM) (Judicial Officer Baxter, Lance)
11/27/2018 Notice to Appear Returned Undelivered
11/30/2018 Announcement (9:00 AM) (Judicial Officer Smith, Benjamin N.)
12/06/2018 Administrative Order
12/13/2018 Status (1:00 PM) (Judicial Officer Baxter, Lance)
01/04/2019 Announcement (9:00 AM) (Judicial Officer Smith, Benjamin N.)
01/10/2019 Status (1:00 PM) (Judicial Officer Baxter, Lance)
02/01/2019 Announcement (9:00 AM) (Judicial Officer Smith, Benjamin N.)
02/07/2019 Status (1:00 PM) (Judicial Officer Baxter, Lance)
03/14/2019 Plea - Agreed (9:00 AM) (Judicial Officer Smith, Benjamin N.)
03/14/2019 *Reset by Court to 03/14/2019*
03/14/2019 Status (1:00 PM) (Judicial Officer Baxter, Lance)
04/11/2019 Status (1:00 PM) (Judicial Officer Baxter, Lance)
05/09/2019 Status (1:00 PM) (Judicial Officer Baxter, Lance)
06/06/2019 Status (1:00 PM) (Judicial Officer Baxter, Lance)
07/11/2019 Status (1:00 PM) (Judicial Officer Baxter, Lance)
08/08/2019 Status (1:00 PM) (Judicial Officer Baxter, Lance)
08/14/2019 Deferred Adjudication (Judicial Officer: Adams, Don)
DEFERRED ADJUDICATION Jury Waived. Defendant arraigned. Defendant warned. Defendant enters plea of guilty before Court and prays that Court withhold adjudication of guilt under Art 42A. Court finds that the evidence and Defendant's plea substantiates the Defendant's guilt of the offense of poss cs pg 1 4g<200g beyond a reasonable doubt as charged in the indictment. Adjudication of guilt Deferred and Defendant placed on probation for 10 years, subject to terms and conditions of probation served on Defendant. Fine: \$1500. Pay \$50 to crime stoppers, perform 200 hrs cs, sub abuse caseload, SAE+conds, RUAs, DOEP, conds CC w/380-83364-18
08/14/2019 Discovery Acknowledgement
08/14/2019 Defendant's Plea Agreement Packet
08/15/2019 Bond Discharged
08/20/2019 Bill of Cost
08/21/2019 Payment Agreement
09/04/2019 CANCELED Pre Trial (8:30 AM) (Judicial Officer Smith, Benjamin N.)
Case Disposed
09/09/2019 CANCELED Jury Trial (9:00 AM) (Judicial Officer Smith, Benjamin N.)
Case Disposed
02/26/2020 EVb - Not Delivered - No Answer
03/25/2020 EVb - Not Delivered - No Answer
04/22/2020 EVb - Not Delivered - No Answer - Pre Omnl
03/17/2021 Payment Agreement
04/28/2021 EVb - Delivered
05/26/2021 EVb - Delivered - Pre Omnl
11/14/2023 Motion Adjudicate Probation Filed-OCA - Reopen
04/29/2024 Letter of Representation
04/29/2024 Notice to Appear Issued
04/29/2024 Warrant Received Executed
04/29/2024 Precept Executed
05/14/2024 Motion
Motion Seeking Reasonable or Personal Recognizance Bond
05/17/2024 First Appearance MTA/MTR (9:00 AM) (Judicial Officer Roach, John R., Jr.)
05/20/2024 Video Plea at Jail (1:30 PM) (Judicial Officer Smith, Benjamin N.)
05/20/2024 Adjudication Hearing
Motion to adjudicate was held. Defendant was present with counsel. Defendant warned and admonished and waives reading of the motion to adjudicate and enters a plea of True. Evidence heard. The Court finds that during the term of the deferred adjudication probation, the defendant did violate the terms and conditions of deferred adjudication probation as alleged in paragraph(s) 1-7. Deferred Adjudication Continued.
05/20/2024 Court Reporter's Notes
Proceedings reported by David R. Roy, Official Court Reporter, Aux Court C, Plea
05/20/2024 Defendant's Plea Agreement Packet
05/22/2024 Payment Agreement
05/29/2024 Bill of Cost
10/10/2024 Letter
Letter to judge from defendant.
10/21/2024 Motion for Early Release from Deferred Adjudication Prob.
10/23/2024 Order
VACATED
10/24/2024 General Docket Entry
Early release order signed by judge is vacated.
10/24/2024 Recommendation Letter
11/21/2024 Motion Adjudicate Probation Filed-OCA - Reopen
12/06/2024 Motion to Quash
12/09/2024 Motion to Quash
12/16/2024 Mental Health Assessment
12/16/2024 Motion
Motion Seeking Reasonable or Personal Recognizance Bond
01/14/2025 Motion to Reduce Bond
02/05/2025 Warrant Received Executed
02/05/2025 Precept Executed
02/06/2025 Hearing Set Bond (9:00 AM) (Judicial Officer Roach, John R., Jr.)
Orig. Bond: \$75,000
02/06/2025 General Docket Entry

https://cijspub.co.collin.tx.us/SecurePA/CaseDetail.aspx?CaseID=1769878

2/3

Exhibit 3:

Description: Affidavit of no service or other documentation (e.g., correspondence) confirming the absence of notice or hearing for the vacatur.

Purpose: Reinforces due process claims (Mullane v. Central Hanover Bank, 339 U.S. 306).

EXH-003 – Affidavit of No Notice or Service of Motion to Adjudicate

Cause No. 380-83365-2018

In re Alexis Lorene Landrum

Fifth Court of Appeals, Dallas, Texas

Affidavit of No Notice or Service Attempts

I, Alexis Lorene Landrum, declare under penalty of perjury pursuant to Tex. Civ. Prac. & Rem. Code § 132.001 that the following statements are true and correct and based on my personal knowledge:

1. I am the Petitioner in the above-captioned matter. This affidavit is submitted as EXH-004 in support of my Original Petition for Writ of Mandamus.
2. As of June 18, 2025, I have never been formally served with a copy of the Motion to Adjudicate Guilt (MTA) that was allegedly filed against me in November 2024 in Cause No. 380-83365-2018.
3. I did not receive any notice of the MTA filing either by mail, in person, electronically, or through my attorney at the time of filing.
4. I did not become aware of the Allegations in the MTA until April 2025, when my current court-appointed attorney, Maria Tu, emailed me a copy. By that time, I had already been incarcerated, released on bond, and forced to navigate multiple court appearances without knowledge of the allegations pending against me.
5. At no point between October 23, 2024 (the date of my early dismissal order) and April 2025, was I provided with any documentation, citation, or formal process indicating that my probation had been reinstated or that a new violation had been initiated.
6. My review of the Collin County online docket shows a note stating that the October 23, 2024 dismissal was “vacated” on October 24, 2024—but no signed order was entered, and no action was taken to notify me or my legal

representative at that time.

7. Because I was not given legal notice of the MTA, I was denied a fair opportunity to respond or prepare a defense, and I continue to be prejudiced by this failure of service.

Executed on this 22nd day of June, 2025.

Respectfully submitted,

Alexis Lorene Landrum
517 W Owing St.
Denison, TX 75020
alexislandrum16@gmail.com
(469) 965-5590

Exhibit 4

Description: Detention records or jail logs documenting the 67-day detention from December 2, 2024, to February 8, 2025, without a magistrate hearing.

Purpose: Supports due process violation under Tex. Code Crim. Proc. Arts. 15.17, 1.051.



Collin County Sheriff's Office
4300 Community Blvd.
McKinney, TX 75071

ARRESTING AGENCY Out of County Agency		SO# 353043 	
ARREST DATE 12/02/2024		ARREST TIME 10:53 AM	
NAME LANDRUM, ALEXIS LORENE		ALIAS NAME(S) LANDRUM, ALEXIS; LANDRUM, ALEXIS L	
ADDRESS 517 W OWING ST DENISON TX 75020	RACE WHITE	SEX FEMALE	DATE OF BIRTH 01/16/1998
		AGE 27	

CHARGES INFO

ARREST DATE	OFFENSE	WARRANT TYPE	CHARGE DEGREE	WARRANT/REF.	CAUSE NUMBER	ISSUING AUTHORITY	BOND AMOUNT	BOND TYPE	CHARGE COMMENTS
12/02/2024	POSS CS PG 1 >=4G<200G	MOTION TO ADJUDICATE	SECOND DEGREE FELONY	380-83365-2018 - 3	380-83365-2018	296TH DISTRICT COURT	750.00	CASH BOND ONLY	PER JUDGE ROACH

SENTENCE INFO

SENTENCE DATE	OFFENSE	CAUSE NUMBER	SENTENCE	DAYS CREDIT	SENTENCED AGENCY	TOTAL AMOUNT DUE	DUE WITHIN / SENTENCE COMMENTS
	POSS CS PG 1 >=4G<200G	380-83365-2018				0.00	PRECEPT TO SERVE: MOTION TO ADJUDICATE

DISPOSITION INFO

DISPOSITION DATE	OFFENSE	WARRANT/REF.	CAUSE NUMBER	CHARGE DISPOSITION	DISPOSITION COMMENTS
02/07/2025	POSS CS PG 1 >=4G<200G	380-83365-2018 - 3	380-83365-2018	CASH BOND	

FINAL RELEASE

Release Date:	02/08/2025	Release Time:	8:19 AM	Release Officer:	Geder, Pebble Darchey	Release Comment:	PER SGT OKOLIE
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END OF REPORT

Exhibit 5:

Description: Court order or receipt showing the imposition of a \$750 cash bond from February 13 to May 19, 2025.

Purpose: Provides context for bond status during the proceedings

requested

Exhibit 6

Description: Affidavit or court order declaring Alexis Lorene Landrum indigent, supporting the waiver of court costs.

Purpose: Justifies indigency status (Tex. Code Crim. Proc. Art. 1.051(d)).

Family Member Phone*

9032512250

Email Address*

alexislandrum16@gmail.com

Do you have a Social Security Number?*

☒ Yes ☐ No

Social Security Number*

635607093

Are you a US Citizen?*

☒ Yes ☐ No

I currently receive:

☐ Medicaid

☐ SSI/SSDI

☐ Food Stamps/SNAP

☐ TANF

☐ CCIHP

☐ Public Housing

Marital Status*

☒ Single ☐ Married ☐ Divorced ☐ Widowed ☐ Separated

Do you have any dependent children?*

☒ Yes ☐ No

Name of Dependent Child(ren) (0-17 yrs.)

Name*

Everleigh Landrum

Age*

1

Are you Employed?*

☒ Yes ☐ No

If Yes, Where?*

Self employed caregiver for elderly

Pay Rate*

☐ Hourly ☒ Salary

Salary per week:*

\$ 125.00

**How long have you worked
at this job?***

2 years

Please complete employment history

Prior Place of Employment

Texas tobacco

Length of Time

1 year

Gross Monthly Income

650

RESIDENCE INFORMATION

Please choose one:*

☐ Own

☐ Rent

☒ Reside with Family/Friend

☐ Homeless

Monthly Income

My Take Home Pay If Employed*

\$ 500.00

Child Support (Received)*

\$ 0.00

SSI or SSDI*

Unemployment*



Affidavit of Indigence

Select Language ▼

Powered by Google Translate

Please note that Google translator is a helpful tool but Collin County does not validate the accuracy of the translation.

THIS PORTION TO BE COMPLETED BY OR WITH DEFENDANT

Case Type: *

- ☒ Adult Criminal ☐ CPS
☐ AG – Child Support (Respondent Only) ☐ Motion for Enforcement

Are You in Custody? *

- ☐ Yes ☒ No

Are You in Court Today? *

- ☐ Yes ☒ No

Why are you filling out this form? *

- ☒ Request Court Appointed Attorney ☐ Hire/Waive Counsel
☐ Program Fee Waiver ☐ Waiver of Court Costs/Fines

Do you need an Interpreter? *

- ☐ Yes ☒ No

Case Number:

380-83365-2018

SO #:

353043

First Name *

Alexis

MI

L

Last Name *

Landrum

Homeless *

- ☐ Yes ☒ No

Address *

Street Address

517 W Owing St

Address Line 2

City

Denison

Postal / Zip Code

75020

State / Province / Region

TX

Date of Birth *

1/16/1998

Phone Number Home

4699655590

Phone Number Cell *

4699655590

Phone Number Work

4699655590

UNSWORN DECLARATION BY DEFENDANT

My Name is (First, Middle, Last) *

Alexis Landrum

My Date of Birth: *

1/16/1998

My Address is: *

Street Address

517 W Owing St

Address Line 2

City

Denison

State / Province / Region

TX

Postal / Zip Code

75020

I declare under penalty of perjury that the foregoing is true and correct. Executed in Collin County, State of Texas *



DEFENDANT'S OATH

I have been advised of my right to representation by counsel in connection with the charge pending against me. I certify that I am without means to employ counsel of my own choosing and I hereby request the court to appoint counsel for me.

Defendant's Signature *



Date

06/02/2025

11:58:56 AM

Exhibit 7:

Description: Copies of motions filed on March 19-20, 2025, that remain unresolved as of the May 1, 2025, deadline (e.g., motion for notice, motion for counsel).

Purpose: Demonstrates procedural delays and due process issues.

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.

Envelope ID: 98652855

Filing Code Description: Motion

Filing Description: Motion to vacate the order vacating early termination, dismiss motion to adjudicate with prejudice or alternatively stay proceedings for final disposition.

Status as of 3/20/2025 9:04 AM CST

Associated Case Party: The State of Texas

Name	BarNumber	Email	TimestampSubmitted	Status
Gregory Willis	21653500	eserveDA@collincountytx.gov	3/19/2025 3:52:02 PM	SENT

Associated Case Party: AlexisLoreneLandrum

Name	BarNumber	Email	TimestampSubmitted	Status
carl white		carlwhite_attorneyatlaw@yahoo.com	3/19/2025 3:52:02 PM	SENT
Alexis LoreneLandrum		alexislandrum16@icloud.com	3/19/2025 3:52:02 PM	SENT

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Jaimie Valliere-380th, 401st, & Online Solicit of Minor		jvalliere@co.collin.tx.us	3/19/2025 3:52:02 PM	SENT
Brooke Adams		badams@co.collin.tx.us	3/19/2025 3:52:02 PM	SENT

IV. Relief Requested

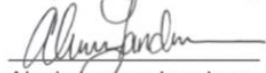
To achieve final disposition and minimize future litigation, Defendant requests:

Vacate the Vacatur and Reinstate Early Termination as Final: Vacate the October 24, 2024, docket entry, reinstate the October 23, 2024, order terminating deferred adjudication, and declare it the final disposition of this case, discharging Defendant from all obligations; and Dismiss Motion to Adjudicate with Prejudice: Dismiss the November 21, 2024, Motion to Adjudicate with prejudice, as its basis is voided by the improper vacatur and lack of due process, precluding refiling and ending this matter; or, alternatively, Stay and Hearing for Final Resolution: Stay all proceedings, including the April 17, 2025, hearing, for 60 days, and order a hearing to resolve the vacatur, adjudication motion, and case disposition, preserving Defendant's appeal rights if relief is denied. Reinstatement as final and dismissal with prejudice serve judicial economy, prevent repetitive filings, and honor Defendant's good-faith reliance on the October 23 order. Defendant poses no risk of flight, having complied with bond conditions since February 7, 2025. Absent such relief, Defendant will appeal to the Texas Court of Appeals, prolonging this matter unnecessarily.

WHEREFORE, Defendant prays the Court:

Vacate the October 24, 2024, order vacating early termination and reinstate the October 23, 2024, order as final; Dismiss the November 21, 2024, Motion to Adjudicate with prejudice; or, alternatively, Stay proceedings for 60 days and set a hearing for final disposition, preserving Defendant's right to appeal; Discharge Defendant from bond conditions pending any appeal to a higher court; and Grant such further relief as the Court deems just.

Respectfully submitted,



Alexis Lorene Landrum, Pro Se
alexislandrum16@icloud.com
469-965-5590
517 W Owing St.
Denison, TX 75020
Date: March 19, 2025

II. Procedural Deficiency and Due Process Violation

The October 24, 2024, vacatur without notice or hearing violated Defendant's due process rights under the Fifth and Fourteenth Amendments to the U.S. Constitution and Article I, Section 19 of the Texas Constitution. "Due process requires notice and an opportunity to be heard before a deprivation of a protected interest." *Mullane v. Central Hanover Bank & Trust Co.*, 339 U.S. 306, 314 (1950); *see also Ex parte Geiken*, 28 S.W.3d 553, 560 (Tex. Crim. App. 2000) (notice and hearing required in probation revocation proceedings). This error renders the vacatur voidable. The November 21, 2024, Motion to Adjudicate relies on this invalid vacatur and unspecified violations never served on Defendant, further breaching due process. "A defendant is entitled to notice of alleged violations to prepare a defense." *Gagnon v. Scarpelli*, 411 U.S. 778, 786 (1973); *see also Caddell v. State*, 605 S.W.2d 275, 277 (Tex. Crim. App. 1980) (probationer must receive written notice of revocation grounds). The 66-day detention without notice, including 28 days without counsel, compounds this violation, denying effective assistance. *See Strickland v. Washington*, 466 U.S. 668 (1984). Continued litigation on these defects risks additional constitutional harm and burdens this Court and higher courts, as Defendant intends to appeal any adverse ruling. Dismissal with prejudice is warranted where procedural errors are "so fundamentally unfair" as to prejudice the defendant irreparably. *See State v. Mungia*, 119 S.W.3d 814, 817 (Tex. Crim. App. 2003) (dismissal with prejudice appropriate for serious due process violations)

III. Legal Citations

1. *Mullane v. Central Hanover Bank & Trust Co.*, 339 U.S. 306 (1950): U.S. Supreme Court case establishing that due process requires notice and a hearing before depriving someone of a protected interest, like Defendant's early termination.
2. *Ex parte Geiken*, 28 S.W.3d 553 (Tex. Crim. App. 2000): Texas case affirming notice and hearing are mandatory in probation revocation proceedings, applicable by analogy to Defendant's vacatur.
3. *Gagnon v. Scarpelli*, 411 U.S. 778 (1973): Supreme Court ruling that probationers are entitled to due process, including written notice of violations—Defendant's lack of violation details fits here.
4. *Caddell v. State*, 605 S.W.2d 275 (Tex. Crim. App. 1980): Texas case reinforcing notice requirements for probation revocation proceedings.
5. *State v. Mungia*, 119 S.W.3d 814 (Tex. Crim. App. 2003): Supports dismissal with prejudice when due process violations are severe, like Defendant's 66-day detention without notice.
6. *Strickland v. Washington*, 466 U.S. 668 (1984): Establishes the right to effective assistance of counsel, applicable to Defendant's 28-day delay without counsel.

These cases support Defendant's due process claims and are cited per Texas Rule of Appellate Procedure 38.1(i).

STATE OF TEXAS	§	IN THE 296
VS.	§	DISTRICT COURT
LANDRUM, ALEXIS LORENE	§	OF COLLIN, TEXAS

Motion to Vacate Order Vacating Early Termination and Dismiss Motion to Adjudicate with Prejudice, or Alternatively Stay Proceedings for Final Disposition

TO THE HONORABLE JUDGE OF SAID COURT: Comes now, Alexis Lorene Landrum, Defendant, pro se, and files this Motion to Vacate Order Vacating Early Termination and Dismiss Motion to Adjudicate with Prejudice, or Alternatively Stay Proceedings for Final Disposition. In support thereof, Defendant shows the Court:

I. Factual Background

On July 2, 2018, Defendant was arrested on original charges POSS CS PG 1 >=4G<200G case no. 380-83365-2018 ABANDON ENDANGER CHILD CRIMINAL NEGLIGENCE case no. 380-83364-2018 POSS MARIJ <2OZ case no. 001-85201-2018 defendant was released on a personal bond on July 17, 2018, after a writ of habeas corpus was filed in the 366th court

On August 15, 2019, in the 380th District Court, Defendant pleaded guilty and received 5 years deferred adjudication for Case No. 380-83364-2018, 10 years deferred adjudication for Case No. 380-83365-2018 case dismissed for case no.

001-85201-2018. to run concurrently.

On May 17, 2024, following an adjudication hearing in the 296th District Court, deferred adjudication was continued for both cases under the original probation conditions.

On July 11, 2024, the 296th District Court dismissed Case No. 380-83364-2018.

On October 21, 2024, Defendant filed a Motion for Early Release in this case, Case No. 380-83365-2018.

On October 23, 2024, this Court granted it, terminating deferred adjudication and relieving Defendant of any conviction.

On October 24, 2024, without notice, hearing, or formal order, the Court vacated the October 23 order via docket entry ("judge's signed order is vacated").

On October 28, 2024, Defendant obtained a court-certified copy and notified her probation officer, believing all obligations had ended.

On November 21, 2024, the State filed a Motion to Adjudicate, alleging violations undisclosed and unserved on Defendant.

On December 2, 2024, Defendant was arrested and held for 66 days without bond and 28 days without counsel until the bond hearing on February 6, 2025.

On February 6, 2025, a \$750 cash bond was granted, posted February 7, 2025.

On March 13, 2025, the status hearing was rescheduled to April 17, 2025, after Defendant checked in with the bailiff by phone due to illness (COVID-19).

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.

Envelope ID: 98688743

Filing Code Description: Motion

Filing Description: Motion to appoint new counsel or time to retain counsel

Status as of 3/20/2025 3:38 PM CST

Associated Case Party: The State of Texas

Name	BarNumber	Email	TimestampSubmitted	Status
Gregory Willis	21653500	eserveDA@collincountytx.gov	3/20/2025 12:19:36 PM	SENT

Associated Case Party: AlexisLoreneLandrum

Name	BarNumber	Email	TimestampSubmitted	Status
carl white		carlwhite_attorneyatlaw@yahoo.com	3/20/2025 12:19:36 PM	SENT
Alexis LoreneLandrum		alexislandrum16@icloud.com	3/20/2025 12:19:36 PM	SENT
Maria Tu		mariatuattorney@yahoo.com	3/20/2025 12:19:36 PM	SENT

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Jaimie Valliere-380th, 401st, & Online Solicit of Minor		jvalliere@co.collin.tx.us	3/20/2025 12:19:36 PM	SENT
Brooke Adams		badams@co.collin.tx.us	3/20/2025 12:19:36 PM	SENT

Motion for Appointment of New Counsel or Extension of Time to Retain Counsel

My currently court appointed attorney Maria Tu was assigned only for the motion to adjudicate. Maria Tu has informed me that their role does not include challenging the vacated order. This leaves me without representation for this critical issue. I am unable to adequately represent myself on this matter and require legal assistance to ensure my rights are protected and to properly address the vacated order before the court proceeds with the motion to adjudicate.

I am acting in good faith and seek only to resolve this matter fairly. I am happy to provide additional information if needed. Thank you for your consideration.

Alvin J. Anderson

Alexis Landrum
Defendant
alexislandrum16@icloud.com
469-965-5590
Date: March 18, 2025

Exhibit 8:

Description: Affidavit, transcript, or court document detailing the May 19, 2025, verbal rulings, including the coerced plea via pass slip and denial of appellate counsel.

Purpose: Supports due process and Sixth Amendment violations (Boykin v. Alabama, 395 U.S. 238; Gideon v. Wainwright, 372 U.S. 335).

requested

- Exhibit 9:

Description: Transcript from the June 18, 2025, call related to the denial of appellate counsel.

Purpose: Evidence of Sixth Amendment violation

Call Transcript

Call to Collin county district clerks office on 06/18/25

Automated message (0:00):

Are Monday through Friday, 7am to 4pm Please listen carefully to the prompts as they have changed. To speak to a clerk concerning a criminal case, please press 1. To speak to A. For general questions or to speak to a criminal clerk, please press 0. If your case number begins with 195. Wait while I transfer your call.

Automated message (0:26):

This call is being recorded.

kim district Clerk (1:10):

District Clerk's Office is kim district Clerk.

Alexis Landrum (1:12):

Hi, kim district Clerk. This is Alexis Landrum. I was just calling to see if y' all got an amended MTA for me.

kim district Clerk(1:22):

What's you talking about? Through E file or so.

Alexis Landrum (1:27):

I didn't file it. I know at my last court date, they said that they were going to change the MTA that they originally filed. So I was just wondering if that was on there yet so I could see the allegations.

kim district Clerk (1:39):

What's Your case number?

Alexis Landrum (1:40):

380-83365-2018

kim district Clerk (2:02):

Is this in the appeals?

Alexis Landrum (2:05):

So I did file the notice of appeal on the 16th, and that's just because they're proceeding with the MTA.

Alexis Landrum (4:13):

Yes. But she made it very clear, and so did the judge, that she was only appointed for the mta. So I don't have an appellate attorney.

kim district Clerk (4:22):

For the appeal, so. Because I don't do appeals at all. Let me let you talk to the clerks because they can give you more information on how that process works.

Alexis Landrum (4:30):

Okay.

kim district Clerk (4:31):

Okay. Is there anything else you need from. Oh, let me give you the email address just in case you need to request all the records out of this case. Okay, you ready? Yes, it's DC for district clerk records with an S at Collin county tx.gov.

Alexis Landrum (4:58):

Okay, thank you.

kim district Clerk (4:59):

Okay, hold on just a second.

Automated System (5:13):

Thank you for holding and welcome to Collin county government. We're one of the fastest growing counties in Texas and home to more than a million residents. And we're still growing. Stop by to see what county services are here for you@collincountytexas.gov searching for court records. You can look up court files on traffic tickets, family courts, civil and criminal cases, active warrants and civil papers. Onesearch covers all levels of the county's court system. Try our judicial search app from the online services section at Collin CountyTX.

christina Appeal Clerk (6:08):

This christina Appeal Clerk, how can I help you?

Alexis Landrum (6:10):

Hi, christina Appeal Clerk, this is Alexis Landrum.

christina Appeal Clerk (6:13):

Yes. Yeah, I have your case pulled up. You had some questions about it?

Alexis Landrum (6:17):

Yes. So it's in appeals right now, but the last time I was at court, they said they were going to change or I guess amend the MTA that I have court for on the 26th. And I was just wondering if that was in yet or how do I know what the allegations are that we're moving forward with. And then another thing is I filed the appeal or the notice of appeal on the 16th and I requested an attorney through the indigent defense office and I haven't heard back from them and I requested that on the 9th.

christina Appeal Clerk (6:52):

Okay. Now when it comes to. I only handle the appeal part of the case.

Alexis Landrum (6:56):

Okay.

christina Appeal Clerk (6:57):

So like any of the your pending things, I wouldn't be able to answer those. I can get some. Someone answer those questions. But when it comes to the appeal part. Well, with. You wanted an attorney that's just handled through their indigent defense. So you, you would have to speak directly to them because we don't appoint anyone because they let us know when they appoint someone.

Alexis Landrum (7:18):

Okay. And then so for the appeal, how am I going to get like the records and the transcripts and stuff?

christina Appeal Clerk (7:27):

kim district Clerk (2:21):

When we filed the MTA November 21, 2024.

Alexis Landrum (2:30):

Because in October, there was an order for dismissal of probation, and then a whole month later, an MTA was filed, and then who would I contact to request the records for appeal?

kim district Clerk (2:53):

Okay, so that order was vacated for the appeals. Are you just needing. Let me let you talk to an appeals clerk for that. But I don't see an amended on here.

Alexis Landrum (3:07):

So it would be the same MTA going forward, it looks like.

kim district Clerk (3:12):

It doesn't look like there's ever been anything filed after that.

Alexis Landrum (3:15):

Because in court, he said that they were going to change it, like they had to change it. I know court's coming up, like, next week, so that's why I'm just trying to figure everything out.

kim district Clerk (3:30):

Who said it? The judge?

Alexis Landrum (3:31):

Yes, ma' am.

kim district Clerk (3:48):

I don't see anything that's been filed yet because there was not since the 20 or in November.

Alexis Landrum (3:58):

Okay. And then on the 9th, I requested an attorney, and they haven't gotten back to me yet. Is there anything that you can see about that?

kim district Clerk (4:09):

I do see that there's an attorney on here. Maria, Tu.

Don't. So once we submit everything, you would just let us know because you would have to pay for a copy of it because what it is, is we'll submit everything to the fifth court of appeals. But if you want a copy sent to you, then you would have to request a copy and you would have to pay for a copy of it.

Alexis Landrum (7:48):

And do I need to give you all the case number once that's filed or will they contact you?

christina Appeal Clerk (7:54):

It will all be under that same case number. So the. Your trial and your appeal is all under the same case?

Alexis Landrum (8:00):

Well, it's because it's not technically an appeal from an order of that. So I had to do a writ for memoranda's because it was outside of the timeframe. Because there hasn't been a final disposition. Because I'm on deferred probation. There hasn't been like a final disposition. I haven't been convicted or anything. There's nothing to really appeal. But I was let off of probation on October 23rd. They filed a motion to adjudicate on November 21st. I didn't know why. I was in jail for 67 days, and I don't even know if I'm still on bond. I don't know if I'm on probation. I mean, I haven't been told anything.

christina Appeal Clerk (8:44):

Okay. And see, like that. Yeah. Have you spoken to your attorney?

Alexis Landrum (8:50):

My attorney said that she's not going to discuss anything with me that has to do with the appeal or any constitutional violations, because she's not that kind of attorney. She was appointed for the MTA only. Yes, but that's my problem is I don't want to move forward with the MTA hearing because y' all really don't have

jurisdiction over the case if it was because the order wasn't vacated correctly.

christina Appeal Clerk (9:15):

Okay. And so that. Yeah, because. Because I know that. Yeah, because with your appeal. Yeah, because you mentioned some order, some motions, but all those motions don't have orders. Yeah, on them.

Alexis Landrum (9:28):

But there was a dismissal order. So the case was done because I was on deferred adjudication, and I got a early termination of deferred adjudication order, signed, stamped, and copied. And they sent it to me. The court did. Then they vacated it through a docket entry, but they did not give me notice of that and they did not hold a hearing for it. So then I got arrested a month later and I did not know what was happening.

christina Appeal Clerk (9:52):

Oh, okay. Yeah, I see the note on here. Oh, okay. From October.

Alexis Landrum (9:56):

Yes.

christina Appeal Clerk (9:57):

Yeah. Okay. Yeah. It's a lot going on with this. Yeah. So I see why you were trying to get an attorney to help you with.

Alexis Landrum (10:06):

Because it's really complicated.

christina Appeal Clerk (10:08):

Yes. Yeah. And so like I said, when it comes to the trying to get a court appointed attorney, then. Yeah, that's through the interject defense. And you have their phone number or you have their email to contact them?

Alexis Landrum (10:23):

Yes, I do. I already tried to contact them on the 9th.
christina Appeal Clerk (10:27):

Okay. And you just hadn't heard back from. Yeah, no. And so the only thing that the area where I work is just handling just the appeal part. We just make sure that the fifth Court of Appeals is notified that you file an appeal on it. And then we. Once they give us the date on when to send that record, then we would do that record and send it to the 5th Court of Appeals to make. Make a decision on it. So, like I said, a trial part, I don't. I don't handle that part. And with the attorney, then indigent defense has to handle that part.

Alexis Landrum (10:59):

Okay. Because I'm just kind of stuck. I've been talking to everybody today, and they're all telling me the same thing.

christina Appeal Clerk (11:04):

I'm sorry.

Alexis Landrum (11:07):

Okay. Thank you.

christina Appeal Clerk (11:09):

You're welcome.

Alexis Landrum(11:10):

Bye.

christina Appeal Clerk(11:11):

Bye.

Exhibit 10:

Description: Pass slip from May 19, 2025, signed by Landrum with a “not true” plea, alleged to be coerced.

Purpose: Supports claim of a coerced plea violating due process.

IN THE 296th DISTRICT COURT
COLLIN COUNTY, TEXAS

STATE OF TEXAS
vs.

Alexis Landrum

§ CAUSE NUMBER:

296- 380 - 83365 - 2018
296-
296-
296-
296-

NOTICE OF AGREED SETTING

NOW COMES THE DEFENDANT in the above styled and numbered cause(s) and would show the Court:

1. The defendant (IS) (IS NOT) in jail.
2. The defendant (IS) (IS NOT) present in court this date Reason:
3. The defendant (Does) (Does not) need an Interpreter

PLEA BARGAIN OFFER

____ YEARS TDC / SJF	PROBATED FOR ____ YEARS
____ MO/YRS DEFERRED	____ FINE
____ DAYS SJF / CCDC	____ RESTITUTION
____ DOEP, RUAs, SAE +cond/SAFP	____ \$50 to Crime Stoppers
____ Community service hours	____ No contact with V/co-defendant(s)

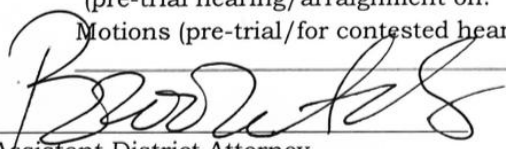
OFFER WITHDRAWN ON _____

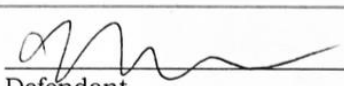
COURT DOCKET SETTING: 6-23-25

Pass Slip for Plea or Trial today ____

This case is passed to 6-23-25 @ 9:00am	(First) (2nd) (Final)
____ Appearance with Attorney	____ Announcement
____ Pleas (OPEN) (AGREED)	☒ Plea (True) (Not True)
____ Video Jail Plea @ 1:30 PM	____ Trial Before Court
____ Hearing Type _____	____ Status

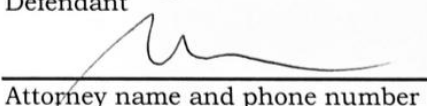
____ Jury Trial Date: @ 9:00 AM
(pre-trial hearing/arraignment on: at 1:30 PM)
Motions (pre-trial/for contested hearings) due _____


Assistant District Attorney


Defendant

Date

5/19/25


Attorney name and phone number

Please be advised, Judge Roach is now requiring all defendants on felony bond to appear in person, in court, to check in with the Bailiff on their original court date, regardless of a reset.

Exhibit 11:

Description: Documentation (e.g., complaint, affidavit) of ineffective assistance by counsel Maria Tu.

Purpose: Supports Sixth Amendment claim (Strickland v. Washington, 466 U.S. 668).

March 17, 2025

****Your prompt Response is requested.****

Dear Maria Tu,

I am writing to express my growing concerns about your representation of me in Case No. 380-83365-2018 in Collin County, particularly regarding the protection of my due process and constitutional rights.

I feel that critical issues in my case—especially the vacating of my early release order on October 24, 2024—have not been adequately addressed, and I need your immediate attention to ensure my rights are upheld.

On October 23, 2024, the court granted my motion for early release from deferred adjudication probation, which I had been on since August 14, 2019. However, the very next day, October 24, 2024, the judge vacated that order without any apparent hearing or notice to me. This sudden reversal has kept me on bond pending adjudication, despite having served over five years of a ten-year term.

without any apparent hearing or notice to me. This sudden reversal has kept me on bond pending adjudication, despite having served over five years of a ten-year term, well beyond the one-third requirement under Texas Code of Criminal Procedure Article 42A.701. I believe this action may have violated my due process rights under the Texas Constitution, Article I, Section 19, and the U.S. Constitution's 14th Amendment, which guarantee me notice and an opportunity to be heard before such a significant change to my liberty.

I am troubled that you have not taken proactive steps to challenge this vacating or to fight for my rights in this matter. Specifically,

1. There has been no apparent effort to request court records or to inform me of the court records to determine if the vacating was procedurally proper.
2. No motion has been filed to reconsider the vacating or to refile for early release, despite my eligibility and ongoing compliance with bond conditions (e.g., NA meetings, CPS requirements per the February 6, 2025, bond order).

I need you to,

- Immediately request all relevant records from the court clerk to investigate the vacating process.
- File a motion to challenge the October 24, 2024, vacating, arguing a violation of my due process rights if no notice or hearing occurred.
- Refile my motion for early release, supported by evidence of my compliance, to end this probation as I am entitled.

If you are unwilling or unable to take these steps to protect my rights, I will have no choice but to seek new counsel who will fight for me. Please respond by March 24, 2025 to confirm your plan to address these issues. If I do not hear from you, I will assume you are withdrawing from my case, and I will proceed accordingly.

Thank you for your attention to this urgent matter. I look forward to your prompt response.

1. There has been no apparent effort to request court records or to inform me of the court records to determine if the vacating was procedurally proper.
2. No motion has been filed to reconsider the vacating or to refile for early release, despite my eligibility and ongoing compliance with bond conditions (e.g., NA meetings, CPS requirements per the February 6, 2025, bond order).
3. My constitutional rights to due process seem to have been overlooked, as I was not given a chance to respond to whatever prompted the judge to reverse the early release order.

You were appointed to me to defend my interests and ensure fair treatment under the law, but I feel this is not happening. The continued delays and lack of action—especially with upcoming proceedings like the April 17, 2025, announcement—leave me at risk of further injustice, including the pending Motion to Adjudicate Probation filed on November 21, 2024.

I need you to,

- Immediately request all relevant

Thank you for your attention to
this urgent matter. I look forward
to your prompt response.

Sincerely,
Alexis Landrum
469-965-5590



Maria Tu Mar 26



to Alexis, me, Maria ▾

Good morning,
Please see the attached copy of the records we
have for your case. Thank you.

Cora
Assistant to Maria Tu

p.S. OUR OFFICE HOURS are 9 am - 2:30 pm

Law Offices of Maria Tu, P.C.

曹祖芳 律師事務所

6600 Chase Oaks Blvd., Suite 150
Plano TX 75023

Tel: 972-964-8366

Text: 405-362-9356 公司簡訊

Fax: 972-964-4811

OUT OF THE OFFICE NOTICE (entire week)

- Exhibit 12:

Description: Affidavit from Landrum detailing irreparable harm, including financial loss

(\$10,000) and distress from potential unlawful detention or probation.

Purpose: Justifies the need for an emergency stay to prevent harm.

family life including the custody of my daughter, my relationships, my clients at work, my schooling, my physical health has declined from the stress due to increased amounts of seizures Medical and other records are attached as Exhibit I(3) mental health assessment Exhibit I(4) for affidavit from family member Exhibit I(5) Fafsa requirements and qualifications Exhibit I(6) physical health, medical records

6. **Causation and Damages:** The court's negligence proximately caused these losses and distress, breaching its duty of care in judicial administration.
7. **Verification:** I swear the foregoing is true and correct based on personal knowledge, pursuant to Texas Government Code § 312.011 and TRCP Rule 166a(f).

Signed this ____ day of _____, 2025.

[Your Full Name]

SWORN AND SUBSCRIBED before me on this ____ day of _____, 2025.

Notary Public, State of Texas
Notary ID: _____
My Commission Expires: _____

[Notary Seal]



- Total financial loss: \$10,200
- Supporting documents are attached as Exhibits I(1) court fees and fines, attorney fees, filing fees, statement of monthly income from employment I(2) transportation receipts, jail commissary receipts,

5. **Emotional Distress:** The court's actions caused severe emotional distress, evidenced by extreme fear in our judicial system, anxiety, insomnia, mental anguish. PTSD This impacted my ability to speak in public settings, to talk to a government official or someone who has higher authority over me without extreme panic attacks, my family life including the custody of my daughter, my relationships, my clients at work, my schooling, my physical health has declined from the stress due to increased amounts of seizures Medical and other records are attached as Exhibit I(3) mental health assessment Exhibit I(4) for affidavit from family member Exhibit I(5) Fafsa requirements and qualifications Exhibit I(6) physical health, medical records

6. **Causation and Damages:** The court's negligence proximately caused these losses and distress, breaching its duty of care in judicial administration.

7. **Verification:** I swear the foregoing is true and correct based on personal knowledge, pursuant to Texas Government Code § 312.011 and TRCP Rule 166a(f).

4. **Financial Loss:** I incurred quantifiable losses, including:

- Itemized losses, 5,000\$ in legal fees, \$750 in bond fees, 1,650\$ and lost income due to incarceration \$450 added expenses, due to incarceration 2,750\$ in lost income due to court delays, 400\$ due to multiple requirements to appear at court transportation
- Total financial loss: \$10,200
- Supporting documents are attached as Exhibits I(1) court fees and fines, attorney fees, filing fees, statement of monthly income from employment I(2) transportation receipts, jail commissary receipts,

5. **Emotional Distress:** The court's actions caused severe emotional distress, evidenced by extreme fear in our judicial system, anxiety, insomnia, mental anguish. PTSD This impacted my ability to speak in public settings, to talk to a government official or someone who has higher authority over me without extreme panic attacks, my family life including the custody of my daughter, my relationships, my clients at work, my schooling, my physical health has declined from the stress due to increased amounts of seizures Medical and other records are attached as Exhibit I(3) mental health assessment Exhibit I(4) for affidavit from family member Exhibit I(5) Fafsa

AFFIDAVIT OF FINANCIAL LOSS AND EMOTIONAL DISTRESS

STATE OF TEXAS COUNTY OF GRAYSON

BEFORE ME, the undersigned notary public, on
this ____ day of _____, 2025, personally
appeared Alexis, Lorene Landrum, who, being duly
sworn, deposes and says:

1. **Affiant's Identity:** I am Alexis Lorene Landrum, residing at 517 West Owing St. 75020 Your Address, City, TX, ZIP I am over 18, of sound mind, and competent to make this affidavit under Texas law.
2. **Jurisdiction and Venue:** This affidavit pertains to actions by the 296th District Court, Collin County, Texas, in 380-3365-2018 case number where negligence occurred.
3. **Statement of Facts:** The 296th District Court's negligence, including unlawful, arrest on December 2, 2024 for 67 days, imposing a \$750 cash bond and bond conditions, continuing felony probation while pending the MTA, improper notation of adverse actions made against me, failure to



Exhibit 13:

Description: Request for clerk's and reporter's records, and request to leave for supplemental records

Purpose: Ensures the appellate court has access to all relevant case materials.

• Status hearing and last pass
announcement on May 19, 2025.

- A certified copy of all changes made to the docket reflecting these events.

I filed a notice of indigence with the Collin County Indigent Defense Office on June 9, 2025, and am unable to pay for copying or transcription fees due to financial hardship. Additionally, I lack transportation to visit the clerk's office, necessitating delivery of these certified records via email to alexislandrum16@gmail.com. Pursuant to the Texas Rules of Appellate Procedure (TRAP) 20.1 and the Texas Government Code, I request a waiver of all associated fees.

These records are critical to my appellate case, particularly to document procedural irregularities and support my claims of due process violations. Please confirm receipt of this request and provide an estimated timeline for providing the records, ideally within 10 business days, given the urgency of an upcoming MTA hearing on June 23, 2025. If additional information or identification is required, I can be reached at 469-965-5590 or via email. I am prepared to provide a copy of my driver's license or other identification upon request.

Thank you for your assistance in this matter. I look forward to your prompt response.

Sincerely,
Alexis Lorene Landrum
Pro Se Litigant
Case No. 380-83365-2018
517 W Owing St.
Denison, TX 75020
Phone: 469-965-5590
Email: alexislandrum16@gmail.com



- The date the case was transferred from the 380th District Court to the 296th District Court.
- Cancellation of the first appearance on May 17, 2025.
- Video plea from jail between May 20, 2025, and May 29, 2025, listing the correct judge who made the disposition (not Judge John Roach).
- Cancellation of the first appearance on February 7, 2025.
- Filing of motions to quash on December 6, 2025, December 9, 2025, and a motion for bond on December 16, 2025, all without hearings set.
- Cancellation of the announcement on March 13, 2025.
- Postponement of the hearing on April 14, 2025, until counsel is appointed.
- Cancellation of the second entry on April 17, 2025.
- Status hearing and last pass announcement on May 19, 2025.
- A certified copy of all changes made to the docket reflecting these events.

I filed a notice of indigence with the Collin County Indigent Defense Office on June 9, 2025, and am unable to pay for copying or transcription fees due to financial hardship. Additionally, I lack transportation to visit the clerk's office, necessitating delivery of these certified records via email to alexislandrum16@gmail.com. Pursuant to the Texas Rules of Appellate Procedure (TRAP) 20.1 and the Texas Government Code, I request a waiver of all associated fees.

These records are critical to my appellate case, particularly to document procedural irregularities and support my claims of due process violations. Please confirm receipt of this request and provide an estimated timeline for providing the records, ideally within 10 business days, given the urgency



Subject: Subject: Inquiry Regarding June 23, 2025,
Court Date and Procedural Clarifications – Case
No. 380-83365-2018

From: alexislandrum16@gmail.com

To: districtclerk@collin.county.org (or appropriate
clerk email, e.g., clerk@collincounty.org, if known)

CC: alexislandrum16@gmail.com

Date: June 22, 2025,

Dear District Clerk,

I, Alexis Lorene Landrum, am a pro se litigant in
Case No. 380-83365-2018, currently pending
a petition for writ of mandamus with the Texas
Court of Appeals, Fifth District, filed on June 18,
2025. Due to my indigent status and ongoing legal
proceedings, I request free certified copies of the
following records in electronic format, as I lack the
financial means and transportation to obtain them
in person:

1. Transcripts and Recording: A full transcript and
audio/video recording of the bond hearing held on
February 6, 2025, in the 296th District Court of
Collin County, reflecting the change of the original
bond from \$75,000 to \$15,000, as initially set by
the Grayson County Magistrate Judge on May 11,
2024.

2. Updated Docket: A certified copy of the updated
docket for Case No. 380-83365-2018, including the
following specific entries:

- The date the case was transferred from
the 380th District Court to the 296th District Court.
- Cancellation of the first appearance on
May 17, 2025.
- Video plea from jail between May 20,
2025, and May 29, 2025, listing the correct judge
who made the disposition (not Judge John Roach).
- Cancellation of the first appearance on
February 7, 2025

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.

Envelope ID: 102279310

Filing Code Description: Motion

Filing Description: Emergency stay requested

Status as of 6/23/2025 8:17 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Gregory Willis	21653500	eserveDA@collincountytx.gov	6/23/2025 6:27:36 AM	NOT SENT
Alexis LoreneLandrum		alexislandrum16@icloud.com	6/23/2025 6:27:36 AM	NOT SENT
Alexis LoreneLandrum		alexislandrum16@icloud.com	6/23/2025 6:27:36 AM	NOT SENT