

**Trial Court Cause No.** \_\_\_\_\_

<b>IN THE MATTER OF:</b>	§	<b>IN THE DISTRICT COURT</b>
<b>[Name]</b>	§	<b>____ JUDICIAL DISTRICT</b>
<b>A CHILD</b>	§	<b>_____ COUNTY, TEXAS</b>
<b>DOB: [DOB]</b>	§	<b>SITTING AS THE JUVENILE COURT</b>

**MOTION FOR RESPONDENT TO APPEAR IN PERSONAL CLOTHING  
AND WITHOUT RESTRAINTS**

**TO THE HONORABLE JUDGE OF SAID COURT:**

Now comes **BRANDON EVERETTE SOLOMON**, a child and Respondent in the above entitled and numbered cause, by and through the undersigned Counsel, and respectfully moves this Court to allow Respondent to appear in personal clothing and without restraints to court during his certification hearing instead of wearing the uniform issued by the Juvenile Detention Center. In support thereof, Respondent would show the following:

1. Respondent is charged with the offense of **[Offense]**.
2. Respondent is set for a certification hearing in this cause on **[Certification Date]**. Appearing in a county-issued uniform and/or in handcuffs, shackles, chains, or other restraints would put Respondent at a severe disadvantage and create a presumption of guilt on the part of the Court and witnesses. This would subject Respondent to unfair prejudice, infringe upon the presumption of innocence guaranteed by the United States and Texas Constitutions, and prevent Respondent from obtaining a fair trial.
3. Respondent has clothes which are available; however, without an order from the Court directing that Respondent be permitted to wear personal clothing, Respondent

will be forced to appear in court wearing the county issued uniform.

4. Respondent further requests that he be allowed to enter the courtroom without handcuffs or any other type of restraint and remain without restraint during the entire course of the certification hearing.

**WHEREFORE, PREMISES CONSIDERED,** Respondent prays that the Court grant this motion and direct the Juvenile Probation Department to allow Respondent to appear in court wearing personal clothes, without restraints of any type.

Respectfully submitted,

**[Attorney of Record]**  
**[Address]**  
**[City], Texas [ZIP Code]**  
**Office [Office Phone]**  
**Facsimile [Facsimile Phone]**  
**Email: [Email]**

By: \_\_\_\_\_  
**[Attorney of Record]**  
**SBN: [SBN #]**  
Attorney for Respondent

**CERTIFICATE OF SERVICE**

I, **[Attorney of Record]** do hereby certify that a true and correct copy of the above and foregoing *Respondent's Motion to Appear in Personal Clothing and Without Restraints* was served via electronic mail or hand-delivered to the **[State Prosecutor]** on **[Date of Service]** in accordance with the Texas Rules of Civil Procedure.

\_\_\_\_\_  
**[Attorney of Record]**

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[Name]	§	___ JUDICIAL DISTRICT
A CHILD	§	_____ COUNTY, TEXAS
DOB: [DOB]	§	SITTING AS THE JUVENILE COURT

**ORDER**

On the undersigned date came on to be considered Respondent's *Motion to Appear in Personal Clothing and Without Restraints* and said motion is hereby

\_\_\_\_\_ GRANTED

\_\_\_\_\_ DENIED, to which ruling the Respondent excepts.

SIGNED AND RENDERED \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Judge Presiding

SIGNED AND RECOMMENDED \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Juvenile Court Referee