

**VIRGINIA:**  
**IN THE COURT OF APPEALS OF VIRGINIA**

**BRIAN DAVID HILL,**  
**Appellant,**

**v.**

**RECORD NO.: 1294-20-3**

**CITY OF MARTINSVILLE,**  
**Appellee.**

**MOTION FOR EXTENSION OF TIME TO FILE A**  
**SUPPLEMENTAL PETITION FOR APPEAL**

Comes now John I. Jones, IV, Esq., counsel for Brian David Hill, the appellant, and moves the Court to allow the petitioner an extension of time in which to file a supplemental petition for appeal, and for grounds thereof states the following:

1. The Martinsville Circuit Court appointed counsel for the petitioner for the purposes of filing a petition for appeal.
2. Counsel has this day filed a petition for appeal pursuant to *Anders v. California*, 386 U.S. 738 (1967), and has filed a motion to withdraw as counsel. Counsel believes it is in defendant's best interest to have an extension of time in which to file a supplemental petition for appeal if he is so inclined.

WHEREFORE, counsel respectfully requests that this Court grant the motion and allow the petitioner a reasonable extension of time in which to file a supplemental petition for appeal.

Respectfully submitted this 13th day of April, 2021.



JOHN I. JONES, IV, ESQ.

Counsel for the Appellant

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### CERTIFICATE

I hereby certify that on April 13, 2021, I have emailed a copy of the foregoing motion to G. Andrew Hall, Commonwealth's Attorney, Office of the Commonwealth's Attorney for the City of Martinsville, counsel for the appellee, at [ahall@ci.martinsville.va.us](mailto:ahall@ci.martinsville.va.us). On the same date, I am emailing a copy of the foregoing motion, along with copies of the motion to withdraw and the petition for appeal filed this day in the same case, to Brian David Hill, c/o Roberta Hill, at [rbhill67@comcast.net](mailto:rbhill67@comcast.net).



John I. Jones, IV, Esq.