

**VERIFIED PETITION FOR COURT TO STAY APPEAL AND
REMAND TO TRIAL COURT FOR NEGOTIATED AGREEMENT**

The Appellant, [name], by counsel, respectfully requests this Court to stay his appeal while he works out a negotiated settlement, which if successful, will result in [name] moving to withdraw his appeal and in support states as follows:

1. On October 23, 2018, [name], pro se, pleaded guilty to a Level 6 felony and two misdemeanors at his initial hearing. His sentence was left to the discretion of the trial court.

2. On November 13, 2018, [name], again pro se, appeared before the trial court for his sentencing hearing. The trial court sentenced [name] to thirty months in the Franklin County Detention Center.
3. On November 26, 2018, [name] filed a pro se Notice of Appeal.
4. Counsel was then appointed for [name] and on December 26, 2018, an amended Notice of Appeal was filed.
5. The record and transcript have been completed.
6. On February 8, 2019, counsel met with [name] at the Franklin County jail.
7. [name]'s brief is currently due to be filed March 11, 2019.
8. Counsel has entered into negotiations with the State and it is the belief of counsel that a negotiated agreement will be reached in this case. If a negotiated agreement can be reached in this case and accepted by the trial court, [name] will then move to withdraw his appeal.

9. The brief is currently due to be filed in this case by March 11, 2019. Counsel believes a negotiated agreement can be reached prior to that date.

10. If a negotiated in reached and accepted by the trial court counsel will file a motion to withdraw appeal.

11. Staying the appeal and reaching a negotiated settlement, if possible, will result in judicial economy, eliminating the need for a direct appeal.

WHEREFORE, the Appellant, Robert [name], by counsel, respectfully requests this Court allow him to stay the appeal and remand to the trial court for the limited purpose of accepting a negotiated settlement between [name] and the State and for all other relief just and proper in the premises.

Respectfully submitted,

