

## § 12.9 Motion for Release After Conviction

### IN THE (SUPREME COURT) (COURT OF APPEALS) OF THE STATE OF KANSAS

STATE OF KANSAS,	)	
	)	
Plaintiff-Appellee,	)	
	)	
vs.	)	[Insert Appellate Court Case Number]
	)	
[Insert Name],	)	
	)	
Defendant-Appellant.	)	
_____	)	

### MOTION FOR RELEASE AFTER CONVICTION

COMES NOW the defendant, John Doe, by and through his undersigned attorney, and moves this Court, pursuant to K.S.A. 22-2804 and Rule 5.06, to issue an order setting an appeal bond in the above-captioned case.

In support of this motion, defendant states as follows:

1. Defendant was convicted in the above-captioned case of the following offense(s):  
Aggravated robbery, K.S.A. 21-3427.
2. Defendant was sentenced as follows: 61 months with 36 months postrelease supervision.
3. The district court has denied defendant's request for an appeal bond (see attached journal entry filed [Insert Date]). [Briefly describe the district court's reasons for denying the bond.]
4. The Court should consider the defendant's family ties, employment possibilities, financial resources, length of residence in the community, prior convictions, and record of appearance during trial [including failure to appear]. [Give specific information about this defendant for each factor mentioned.]
5. [Note whether any previous bonds have been set in the case, including the amount.]

WHEREFORE defendant prays the Court to set an appropriate appeal bond pending a decision in this case and for such other and further relief as the Court deems just and appropriate under the circumstances.

[Name of Law Firm or Agency]

BY \_\_\_\_\_  
[Attorney's Name and Registration Number]  
[Address]  
[City, State and Zip Code]  
[Telephone Number]  
Attorney for [Insert party designation]

#### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Motion for Release After Conviction was furnished, by United States Mail, postage prepaid, this [Insert Date], to:

[Insert names and addresses of those on whom service is made.]

\_\_\_\_\_  
[Attorney's Name and Registration Number]