

NO. 16-0347

IN THE SUPREME COURT OF TEXAS
AUSTIN, TEXAS

RICHARDSON EAST BAPTIST CHURCH

Petitioners,

vs.

PHILADELPHIA INSURANCE COMPANY AND JAMES GREENHAW

Respondents.

On Appeal from the Fifth Court of Appeals
Case No. 05-14-01491-CV

UNOPPOSED MOTION FOR EXTENSION TO FILE
PETITION FOR REVIEW

TO THE HONORABLE COURT OF APPEALS FOR THE FIFTH DISTRICT OF
TEXAS:

COMES NOW, PETITIONERS, RICHARDSON EAST BAPTIST
CHURCH, and files this Unopposed Motion for Extension to file their Petition
for Review, and would show the Court as follows:

1. Petitioner's Petition for Review is due on May 16, 2016.

2. Undersigned Counsel is seeking a thirty day extension to file the Petition for Review due to his involvement in the following matters:

- a. Pre-Trial filings in Cause No. 3:11-cv-01898-L; *Paragon Office Services, LLC, et al. v. Aetna, Inc., et al.*; In the United States District Court for the Northern District of Texas, Dallas Division;
- b. Closing of complicated stock purchase transaction for client; and
- c. Reply to Petition for Writ of Mandamus in Case No. 01-16-00299-CV; *In re: Angela Cornejo and Carlos R. Portillo, Individually*; In the Court of Appeals for the First Judicial District of Texas at Houston.

3. On May 12, 2016, undersigned counsel for Petitioner, conferred with William Pilat, counsel for Respondent Philadelphia Indemnity Insurance Company, and Andrew Edelman, counsel for Respondent James Greenhaw. Both Mr. Pilat and Mr. Edelman stated their clients were unopposed to the extension.

4. Petitioner respectfully requests this Court grant an extension of thirty days from May 16, 2016 and reset the deadline for Petitioner's Petition for Review June 15, 2016. This request is sought not solely for delay, but so that justice may be done in the disposition of this appeal.

WHEREFORE, PREMISES CONSIDERED, Petitioner respectfully requests that this Court grant their Motion and extend the time to file Petitioner's Petition for Review until thirty days from May 16, 2016 making their Petition for Review due on June 15, 2016.

Respectfully submitted,

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By: /s/ F. Leighton Durham, III

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ATTORNEYS FOR PETITIONER

CERTIFICATE OF CONFERENCE

On May 12, 2016, undersigned counsel for Petitioner, conferred with William Pilat, counsel for Respondent Philadelphia Indemnity Insurance Company, and Andrew Edelman, counsel for Respondent James Greenhaw. Both Mr. Pilat and Mr. Edelman stated their clients were unopposed to the extension.

/s/ F. Leighton Durham, III

F. Leighton Durham, III

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this *Unopposed Motion for Extension to File Petitioner for Review* has been forwarded to all counsel of record via the Texas Rules of Civil Procedure on this 16th day of May, 2016.

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