

No. 16-0347

IN THE SUPREME COURT OF TEXAS

RICHARDSON EAST BAPTIST CHURCH,
Petitioner,

v.

**PHILADELPHIA INDEMNITY INSURANCE COMPANY
AND JAMES GREENHAW,**
Respondents.

On Appeal from the Fifth Court of Appeals
Dallas County, Texas
No. 05-14-01491-CV

SECOND MOTION FOR EXTENSION OF TIME TO FILE PETITION FOR REVIEW

TO THE HONORABLE SUPREME COURT OF TEXAS:

Petitioner, Richardson East Baptist Church, files this second motion for extension of time to file Petition for Review, under the authority of Texas Rules of Appellate Procedure 38.6(f) and 10.5(b)(1), and would respectfully show:

A. INTRODUCTION.

1. Petitioner's Petition for Review is currently due on June 15, 2016.
2. Petitioner has sought and received one thirty day extension.

3. This motion seeks an extension of 30 days, or up to and including July 15, 2016.

B. BASES FOR EXTENSIONS.

4. In addition to attempting to prepare the petition for review in this case, Mr. Kelly has been working on the following deadlines:

- * Prepared and attended oral argument in *410 Centre LLC, a Foreign Limited Liability Company, and John B. Urbahns, an Individual*, Cause No. 04-15-00633-CV, in the Fourth Court of Appeals, San Antonio, Texas, on June 14, 2016;
- * Drafted and filed on June 13, 2016, a motion for limited remand, and a brief on June 8, 2016 in *Eric Raye Rieger, et al. v. Ashley Nicole Ramsey*, Cause No. 14-15-00948-CV, in the Fourteenth Court of Appeals, Houston, Texas;
- * Prepared for mediation in *Eric Raye Rieger, et al. v. Ashley Nicole Ramsey*, Cause No. 14-15-00948-CV, on June 15, 2016;
- * Preparing a motion for rehearing in *Daniel Leon Stein v. John Reger and Shu W. Reger*, Cause No. 01-15-00470-CV, in the First Court of Appeals, Houston, Texas, due June 17, 2016; and
- * Further, undersigned counsel was in Austin for a Supreme Court Advisory Committee meeting June 9-10.

C. PRAYER.

5. Therefore, petitioner asks that the Court grant its request for an extension of 30 days to file its petition for review, or up to and including July 15, 2016.

Respectfully submitted,

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Richard East Baptist Church*

CERTIFICATE OF CONFERENCE

I, Peter M. Kelly, certify that I have attempted to confer with opposing counsel, but have not heard back yet. I will supplement this certificate as soon as I learn whether this motion is opposed.

/s/ Peter M. Kelly
Peter M. Kelly

CERTIFICATE OF SERVICE

A true and correct copy of this *Second Motion for Extension* has been forwarded to all counsel of record on June 15, 2016, as follows:

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