

No. 16-0347

IN THE SUPREME COURT OF TEXAS

RICHARDSON EAST BAPTIST CHURCH,
Petitioner,

v.

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

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

**PETITIONER’S REPLY TO OPPOSITION TO MOTION
FOR EXTENSION OF TIME**

TO THE HONORABLE SUPREME COURT OF TEXAS:

1. On April 7, 2017, this court released its long awaited opinion in *USAA Texas Lloyds Co. v. Menchaca*, No. 14-0721, 2017 WL 1311752 (Tex. Apr. 7, 2017). That opinion, issued barely three weeks before the Church’s briefing deadline, reformulated the law relating to contractual and extracontractual damages for insurance company misbehavior in the processing of covered claims.

2. The petitioners' brief on the merits thus must traverse a new legal terrain; while the *Menchaca* opinion can be read as reaffirming or revivifying extant authorities, a post-*Menchaca* brief on the merits in this case is quite different from one drafted pre-*Menchaca*. Hence this final request for more time—so that the Church's brief on the merits may accord with this Court's new formulation of Texas law, and not for delay only.

Respectfully submitted,

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CERTIFICATE OF SERVICE

A true and correct copy of this *Petitioner's Reply to Opposition to Motion for Extension* has been forwarded to all counsel of record on April 27, 2017, as follows:

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