

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 District Court of Appeals
Dallas, Texas
Cause No. 05-14-01491-CV

**PETITIONER'S SECOND MOTION FOR EXTENSION OF TIME
TO FILE ITS MOTION FOR REHEARING**

TO THE HONORABLE SUPREME COURT OF TEXAS:

Petitioner, Richardson East Baptist Church, files this Petitioner's Second Motion for Extension of Time to File its Motion for Rehearing:

A. INTRODUCTION

1. This court denied the petition for review on September 22, 2017.
2. The motion for rehearing is currently due to be filed on or before November 8, 2017.
3. Petitioner has sought and received one thirty day extension.
4. Petitioner seeks an extension of 30 days, or up to and including December 8, 2017.

B. BASES FOR EXTENSION

5. In addition to attempting to prepare the motion for rehearing in this case, Mr. Kelly has been working on the following deadlines:
 - ★ Prepared a post-submission brief in *Jana Lee Flanagan and Lucas Matthew Flanagan v. RBD San Antonio L.P., Davidson Hotel Company LLC and G4S Secure Solution (USA) Inc.*, Cause Nos. 104-16-00761-CV and 04-16-00768-CV, in the Fourth Court of Appeals, San Antonio, Texas, filed on October 31, 2017;
 - ★ Prepared a respondents' comment on amici curiae briefs in *Rey Garza v. Roxana Regalado Harrison and Joseph Santellana, Individually and Representative of the Estate of Jonathen Anthony Santellana, Deceased*, Cause No. 17-0724, in the Supreme Court of Texas, filed on October 31, 2017;

- ★ Preparing a brief on the merits in *Nabors Wells Services, Ltd. f/k/a Pool Company Texas, Ltd. and Lauro Bernal Garcia v. Asuncion Romero, Individually and as Representative of the Estate of Aide Romero, Deceased, and as Next of Edgar Romero and Saul Romero, Esperanza Soto, Individually and as Next Friend of Esperanza Soto, Guadalupe Soto, Maria Elena Soto and Martin Soto*, Cause No. 16-0268, in the Supreme Court of Texas, due November 13, 2017; and
- ★ Preparing a reply brief in *John Barfield and Tana Barfield, Wife, Individually, and John Barfield and Tana Barfield as Next Friends of C.B. and K.B.*, Cause No. 08-17-00059-CV, in the Eighth Court of Appeals, El Paso, Texas, due November 15, 2017.

C. PRAYER

Therefore, Petitioner respectfully asks that the Court grant its request and extend the time to file its motion for rehearing, or up to and including December 8, 2017.

Respectfully submitted,

KELLY, DURHAM & PITTARD, LLP

/s/ Peter M. Kelly

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Counsel for Petitioner

Richard East Baptist Church

CERTIFICATE OF CONFERENCE

I, Peter M. Kelly, certify that I have conferred with opposing counsel, Andrew Edelman, counsel for Respondent James Greenhaw, who stated that he does not oppose this motion. William Pilat, counsel for Respondent Philadelphia Indemnity Insurance stated he is opposed to this request for an extension of time.

/s/ Peter M. Kelly

Peter M. Kelly

CERTIFICATE OF SERVICE

A true and correct copy of this *Petitioner's Second Motion for Extension of Time to File its Motion for Rehearing* has been forwarded to all counsel of record on November 8, 2017, as follows:

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