

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

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE PETITION FOR REVIEW**

TO THE HONORABLE SUPREME COURT OF TEXAS:

Petitioner, Richardson East Baptist Church, files this 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 was due on July 15, 2016.
2. Petition for Review was filed on July 18, 2016.

3. This motion seeks an extension of three days, or up to and including July 18, 2016.

B. BASES FOR EXTENSIONS.

4. Counsel attempted to file the petition for review on July 15, 2016, but was unsuccessful, due to ProDoc e-filing system issues. On July 16 at 2:09 p.m., counsel filed it through ProDoc, but the time-stamped indicates 12:00 a.m. on July 18. The delay in filing was not due to anything counsel did.

C. PRAYER.

5. Therefore, petitioner asks that the Court grant its request for an extension of 3 days to file its petition for review timely, or up to and including July 18, 2016.

Respectfully submitted,

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/s/ Peter M. Kelly

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*Counsel for Petitioner/Appellant
Richard East Baptist Church*

CERTIFICATE OF CONFERENCE

I, Peter M. Kelly, certify that I have conferred with opposing counsel, and Andrew Edelman, stated he does not oppose this request for an extension of time.

/s/ Peter M. Kelly
Peter M. Kelly

CERTIFICATE OF SERVICE

A true and correct copy of this *Motion for Extension* has been forwarded to all counsel of record on July 18, 2016, as follows:

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