

NO. 16-0549

In The Supreme Court of Texas

DR. BEHZAD NAZARI, D.D.S., ET AL
Petitioners,

v.

THE STATE OF TEXAS and ACS STATE HEALTHCARE, LLC
Respondents.

No. 03-15-00252-CV in the Third Court of Appeals
No. D-1-GN-14-005380 in the 53rd District Court of Travis County

UNOPPOSED MOTION TO EXTEND TIME TO
FILE PETITION FOR REVIEW

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TO THE HONORABLE TEXAS SUPREME COURT:

COMES NOW, Petitioners, Dr. Behzad Nazari, D.D.S., et al. and file this, their Unopposed Motion to Extend Time to File Petition for Review, and would show as follows:

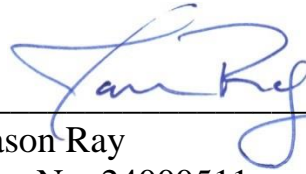
On February 26, 2016 the Third Court of Appeals issued an Opinion in this matter styled Cause No. 03-15-00252-CV; Dr. Behzad Nazari, D.D.S. d/b/a Antoine Dental Center, et al. v. The State of Texas, et al. On March 28, 2016, Petitioners filed a Motion for Rehearing. On June 17, 2016 the Third Court of Appeals withdrew its opinion and issued a new opinion. Petitioners' Petition for Review is due Friday, July 29, 2016.

Petitioners respectfully request an extension of 30 days to file their Petition for Review. Petitioners' counsel is working to determine the precedent that best supports granting of the petition for review. In addition, Petitioners' counsel is experiencing a heavy workload and is presently preparing to begin a 3 day trial. An extension would permit counsel to prepare a more comprehensive and concise petition for review. This is Petitioners' first request for an extension.

PRAYER

For these reasons, Petitioners requests that the deadline for the filing of the Petition for Review in this case be extended to Monday, August 29, 2016.

Respectfully Submitted,



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CERTIFICATE OF CONFERENCE

I communicated by email on July 18, 2016 with opposing counsel for the State of Texas, Raymond C. Winter and with opposing counsel for ACS State Healthcare, Connie Pfeiffer and they advised that they do not oppose this motion.



CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served by eFile TX and Fax on July 25, 2016 to the following:

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