

No. 17-0052

The Supreme Court of Texas

LAURA PRESSLEY
Petitioner,

v.

GREGORIO (GREG) CASAR
Respondent.

*On Petition for Review from the
Third Court of Appeals – Austin, Texas
No. 03-15-00368-CV*

MOTION TO EXTEND WORD LIMIT FOR REPLY

TO THE HONORABLE TEXAS SUPREME COURT:

Now comes Petitioner, Dr. Laura Pressley, *PRO SE*, pursuant to Texas Rule of Appellate Procedure 9.4(i)(4), moves this court to grant an extension of the word limit requirement for Petitioner's Reply, and respectfully states:

1. Pursuant to the Texas Rule of Appellate Procedure 9.4(i)(2)(E) the word limit for a Reply is 2,400 words.

2. Dr. Pressley, *PRO SE*, seeks an additional, 1,000 words extending the maximum word limitation to 3,400 words for her Reply. The extension is needed

because Respondent raised, for the first time, issues of mootness in their Response. Petitioner now has the additional burden of replying to and defeating mootness claims.

3. This motion is in the interest of justice and a systematic presentation of jurisdictional merits of this case. An increase in the word limitation to 3,400 is sufficient for Petitioner, *PRO SE*, to respond to the mootness claims and ensure this Court receives the decisive information to accept it for full briefing.

4. To prevent Dr. Pressley, and other candidates for political office in Texas, from suffering the same constitutional and statutory deprivations in the future, Petitioner needs the extra 1,000 words to thoroughly brief this Court on the advanced circumstances that will trigger the capable of repetition yet evading review exemption to the mootness doctrine and ensure the case is fully heard.

5. Dr. Pressley, *PRO SE*, has conferred with counsel for Respondent, who opposes this Motion.

6. Of course, this Court is vested with discretion to grant this motion by Texas Rules of Appellate Procedure Rule 9.4(i)(4), for situations like this where the Reply is near the maximum. Should this Court not grant this motion, Dr. Pressley, *PRO SE*, will be deprived of a fair ability to meet her burden to defeat the mootness claims and adequately present the case for review.

7. This is the first request for extension of word limitation Dr. Pressley, *PRO SE*, has presented to this Honorable Court for the filing of her Reply.

PRAYER

For these reasons, Petitioner, Dr. Pressley, *PRO SE*, respectfully asks this Court enter an order extending the word limitations for Reply to no more than 3,400 words. Dr. Pressley, *PRO SE*, also requests any other relief to which she may be entitled.

Respectfully submitted,

By: 
Dr. LAURA PRESSLEY, PH.D.
10203 Woodglen Cove
Austin, TX 78753
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PRO SE

CERTIFICATE OF CONFERENCE

Petitioner, Dr. Laura Pressley, *PRO SE*, has conferred with Mr. Kurt Kuhn, lead counsel for Respondent and opposes this Motion.



LAURA PRESSLEY
PRO SE

CERTIFICATE OF COMPLIANCE

I hereby certify that this motion complies with the typeface requirements of the Texas Rules of Appellate Procedure. This motion has been prepared in a proportionally spaced typeface using Microsoft Word in 14-point Times New Roman Font.



LAURA PRESSLEY
PRO SE

AFFIDAVIT – LAURA PRESSLEY

STATE OF TEXAS §
COUNTY OF Travis § ss.


KNOW ALL MEN BY THESE PRESENTS

Before me, the undersigned Notary, personally appeared LAURA PRESSLEY, who satisfied me as to her identity, and who, upon administration of oath or affirmation by me, declared and deposed as follows:

I am Laura Pressley. I am at least 21 years of age, and I am competent to make this Affidavit. I have personal knowledge of these facts, which facts are true and correct.

There is no purpose other than those stated in this motion for this request for extension of words. Also, there is continuing appellate activity by another Appellant in this matter.

Further, Affiant sayeth not.



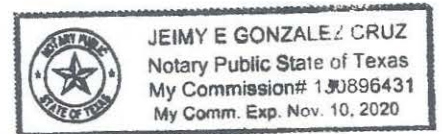
LAURA PRESSLEY, Affiant

Signed and sworn to before me on this the 29th day of August, 2017, for which witness my seal and signature.



Notary Public Signature

(seal)



(If seal is not by stamp, or not legible)

Jeimy E Gonzalez Cruz

Notary Public Printed Name

My Commission Expires:

NOV. 10, 2020

CERTIFICATE OF SERVICE

By my signature below, I hereby certify a true and correct copy of this Unopposed Motion for Extension was served via electronic services on the following counsel of record on or about August 29, 2017:

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