

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 THE REPLY IN SUPPORT OF THE PETITIONERS' BRIEF ON
THE MERITS

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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 the Reply in Support of Petitioners' Brief on the Merits, and would show as follows:

The deadline to file the Reply In Support of Petitioners' Brief on the Merits is set for July 25, 2017. Petitioners seek a 20 day extension, creating a new deadline of August 14, 2017. This is the Petitioner's first request for an extension of time to file the Reply. No party opposes this request.

I.

This extension is sought to accommodate the schedule of the undersigned counsel, who is staffed on several other related matters active during the current time frame for preparing the reply brief, including:

- *State v. Xerox Corporation, et al*, D-1-GV-14-00581: preparation for seven days of previously noticed depositions, which occurred on July 19-20, and will occur on July 27-28, ;
- *Dentistry of Brownsville, PC, et al v. Texas Health and Human Services Commission, et al*, D-1-GN-005358: appellate brief due to the Third Court of Appeals;

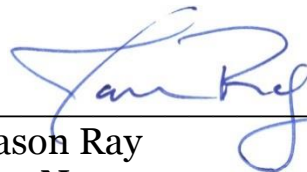
- *Texas Department of Savings and Mortgage Lending v. Tommy Jones, and SWBC*, File No. 170274, attendance of investigative review on Tuesday, July 25, 2017;

An extension would permit counsel to prepare a more comprehensive reply.

III. PRAYER

For these reasons, Petitioners' request that this Court grant a 20-day extension of time to file their brief on the merits, creating a new deadline of August 14, 2017.

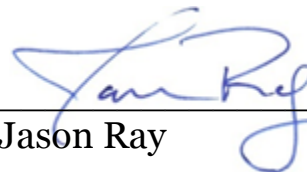
Respectfully Submitted,



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CERTIFICATE OF CONFERENCE

I communicated on July 20, 2017 with opposing counsel for the State of Texas, Cam Barker and with opposing counsel for ACS State Healthcare, Connie Pfeiffer and they advised that they do not oppose this motion.




Jason Ray

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 21, 2017 to the following:

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