

No. 17-0052

IN THE
SUPREME COURT OF TEXAS

Laura Pressley,

Petitioner,

v.

Gregorio “Greg” Casar,

Respondent.

UNOPPOSED MOTION TO EXTEND TIME
TO FILE RESPONSE TO PETITION

TO THE HONORABLE SUPREME COURT OF TEXAS:

Pursuant to Rule 10.5(b) and Rule 53.7 of the Texas Rules of Appellate Procedure, Respondent files this motion and asks for a thirty (30) day extension of time by which to file his response to the petition. The Court recently requested a response to the petition and set the response date as July 10, 2017. Granting this motion would make the brief due on August 9, 2017.

This request is not made for the purpose of delay, but instead is necessary to allow Respondent’s appellate counsel, Kurt Kuhn, adequate time to properly prepare the response. Mr. Kuhn has several other matters that have and continue to impede Mr. Kuhn’s ability to finish the response by the current deadline, including drafting

time-sensitive post-verdict motions on a recent verdict in a new matter and drafting a cross-appellee brief in No. 03-16-00839-CV, *National Media Corporation and Acme Partnership, L.P., v. City of Austin*, in the Third Court of Appeals.. Also, Mr. Kuhn is scheduled to be out of the state on a pre-planned family vacation during the time just prior to the current deadline.

This is the first request for an extension of time for the response in this case. The motion is unopposed. Neither the Court nor any party will be prejudiced by the granting of this motion. This extension is not sought for the purposes of delay, but to allow Respondent's counsel adequate time to fully brief the issues for the Court.

Prayer

For these reasons, Respondent asks for an additional thirty (30) days to file his brief, extending the time until August 9, 2017.

Dated: June 21, 2017

Respectfully submitted,

By: /s/Kurt Kuhn

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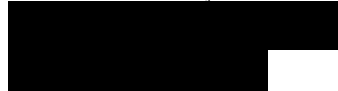
CERTIFICATE OF CONFERENCE

Pursuant to Texas Rule of Appellate Procedure 10.1, I hereby certify that I conferred with Petitioner Laura Pressley regarding this motion. Ms. Pressley indicated that she was unopposed to the granting of the relief sought in this motion.

/s/ Kurt Kuhn
Kurt Kuhn

CERTIFICATE OF SERVICE

I hereby certify that, on June 21, 2017, I served electronically a copy of this motion on counsel of record as listed below:

Laura Pressley


/s/ Kurt Kuhn
Kurt Kuhn