

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

E. A. RENFROE & COMPANY, INC.,)	
)	
Plaintiff,)	CIVIL ACTION NO.
)	2:06-CV-06-WMA-1752-S
-vs-)	
)	
CORI RIGSBY MORAN and)	Judge William M. Acker, Jr.
KERRI RIGSBY,)	
)	
Defendants.)	
_____)	

JOINT MOTION FOR EXTENSION OF TIME

Plaintiff E. A. Renfroe & Company, Inc. and Defendants Cori Rigsby and Kerri Rigsby are negotiating a settlement that would resolve all the remaining issues in this case. Because of these on-going settlement negotiations, the parties jointly request that this Court extend the deadlines for briefing set out in the Order dated January 28, 2009 (Dkt. 414) and the Memorandum Opinion and Order dated February 9, 2009 (Dkt. 418).

The parties seek to extend the deadlines stated in these two orders by two weeks to allow the parties to work out the details of settlement. If the parties do reach a settlement agreement, they will promptly notify this Court to seek abatement of all remaining deadlines.

ACCORDINGLY, the parties jointly and respectfully request that this Court amend its orders in Dkt. 414 and 418 to extend each deadline listed by fourteen calendar days.

Respectfully submitted this 12th day of February, 2009.

By: /s/ Jack E. Held

Jack E. Held

Alabama Bar No. 6188-H65J

jackheld@sirote.com

/s/ J. Rushton McClees

J. Rushton McClees

Alabama Bar No. ASB-8805-C39J

rmcclees@sirote.com

SIROTE & PERMUTT, P.C.

2311 Highland Avenue South

Birmingham, Alabama 35205

205-930-5100

205-930-5101

And

By: /s/ Barbara Ellis Stanley

Barbara Ellis Stanley

Admitted Pro Hac Vice

Texas Bar No.: 19043800

bstanley@helmsgreene.com

HELMS & GREENE, LLC

One City Centre, Suite 1290

1021 Main Street

Houston, Texas 77002

713-651-0277

713-651-0288 (Fax)

bstanley@helmsgreene.com

ADDITIONAL CO-COUNSEL FOR PLAINTIFF:

Victoria L. Helms, Esq.
(Admitted to Practice *Pro Hac Vice*)
Georgia Bar No. 344228
vhelms@helmsgreene.com

Steven S. Greene, Esq.
(Admitted to Practice *Pro Hac Vice*)
Georgia Bar No. 308715
sgreene@helmsgreene.com

Helms & Greene, LLC
5 Concourse Parkway, Suite 2575
Atlanta, GA 30328
tel: (770) 206-3371
fax: (770) 206-3381

AND

By: /s/ Harlan F. Winn, III
Harlan F. Winn, III
Robert E. Battle
BATTLE FLEENOR GREEN
WINN & CLEMMER LLP
The Financial Center, Suite 1150
505 North 20th Street
Birmingham, Alabama 35203
Telephone: 205-397-8161
Fax: 205-397-8179
Attorneys for Defendants