

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 ADDITIONAL EXTENSION OF TIME

The settlement negotiations between Plaintiff E. A. Renfroe & Company, Inc. and Defendants Cori Rigsby and Kerri Rigsby are bearing fruit, and the parties are very close to finalizing a settlement. They do, however, need additional time to resolve specific language of the agreement and its supporting documents.

To provide them the time necessary to finalize their settlement documents, the parties jointly request that this Court again extend the deadlines for briefing set out in the Order dated January 28, 2009 (Dkt. 414), the Memorandum Opinion and Order dated February 9, 2009 (Dkt. 418) and modified by Docket entry on February 13, 2009.

The parties seek to extend the deadlines stated in Dkt. 414 and 418 by an additional 30 days to allow the parties to work out the details of settlement. The parties will promptly notify this Court when the settlement documents have been finalized 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 as modified on February 13, 2009 to extend each modified deadline listed by thirty calendar days.

Respectfully submitted this 27th 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