

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

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

JOINT MOTION FOR ADDITIONAL EXTENSION OF TIME

The settlement agreement between Plaintiff E. A. Renfroe & Company, Inc. and Defendants Cori Rigsby and Kerri Rigsby includes not only the remaining issues in this case but also all of the issues between these parties in the *qui tam* suit pending in Mississippi (*United States ex rel. Rigsby v. State Farm Mutual Insurance Company, et. al*, Cause No. 1:06-cv-433, filed in the United States District Court for the Southern District of Mississippi, Southern Division). Because this settlement encompasses both suits and complex issues, there are, of necessity, numerous lawyers involved in crafting the precise language of the settlement agreement and its supporting motions and proposed orders.

To provide them the time necessary to finalize their settlement documents, the parties once again jointly request that this Court 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 current briefing deadlines are March 30, 2009 and April 1, 2009, respectively. The parties seek to extend the current briefing deadlines by an additional 7 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 grant this Joint Motion for Additional Extension of Time, extending the current deadlines to April 6, 2009 and April 8, 2009.

Respectfully submitted this 30th day of March, 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