

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

COURTNEY B. WARREN,

*Plaintiff,*

V.

PNC BANK, NATIONAL ASSOCIATION  
F/K/A BBVA USA, et al.

*Defendants.*

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CIVIL ACTION NO. 4:23-cv-01397

**PLAINTIFF’S MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO PNC’S  
MOTION FOR SUMMARY JUDGMENT**

Plaintiff Courtney Warren (“Plaintiff”), by and through undersigned counsel, hereby files this motion respectfully requesting that the Court extend Plaintiff’s deadline to file her response in opposition to Defendant PNC Bank, National Association’s (“PNC” or “Defendant”) Motion for Summary Judgment by fourteen (14) days, or until Monday, May 27, 2024, and in support thereof, states as follows:

1. On April 22, 2024, Defendant PNC filed its Motion for Summary Judgment (Dkt. 12).
2. Plaintiff and Plaintiff’s counsel has had an unexpected increase in workload this past month and has been unable to complete her response by the current deadline of May 13, 2024, as anticipated. Accordingly, Plaintiff requests that the response deadline be extended by fourteen days.
3. Good cause exists for the requested extension, and it is not sought for purposes of delay, but so that justice may be done.

4. Defendants will not be prejudiced by the requested extension. Undersigned counsel has sent counsel for PNC an email conferring on the relief requested herein and will file an updated certificate of service once she is notified Defendant's position

WHEREFORE, Plaintiff respectfully requests that the Court grant this unopposed motion for extension of time to extend the deadline to file her response in opposition to Defendant's Motion for Summary Judgment (Dkt. 12) by fourteen (14) days, or until Monday, May 27, 2024,

Respectfully submitted this 13<sup>th</sup> day of May, 2024,

By: /s/ Courtney B. Warren  
Courtney B. Warren  
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-AND-

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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF CONFERENCE**

I hereby certify that I attempted to confer with counsel for Defendant PNC via email on May 13, 2024, and have yet to receive a response. I will file an updated certificate of service once I am notified of Defendant's position.

/s/ Courtney B. Warren  
Courtney B. Warren

**CERTIFICATE OF SERVICE**

I hereby certify that on May 13, 2024, a true and correct copy of the foregoing instrument was served electronically via the Court's CM/ECF system on all counsel of record.

/s/ Courtney B. Warren  
Courtney B. Warren