



HUSCHBLACKWELL
S A N O E R S L L P

Sean D. Tassi
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August 18, 2009

Clerk of Court
Missouri Court of Appeals - Western District
1300 Oak
Kansas City, Missouri 64106

Re: *Lipari v. Novation, LLC, et al.*
Our File No.: 7060-77

Dear Clerk:

Attached for filing please find a Motion for Extension of Time to File Respondent's Brief.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Sean D. Tassi

SDT/sm

Attachment

**IN THE COURT OF APPEALS OF MISSOURI
WESTERN DISTRICT**

SAMUEL K. LIPARI,)	
)	
Appellant,)	
)	
v.)	Case No. WD 70832
)	
NOVATION, LLC, et al.,)	
)	
Respondents.)	

MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S BRIEF

Respondent Busch Blackwell Sanders LLP ("Respondent") by and through its attorneys of record, respectfully request that the Court grant them an additional thirty (30) days, up to and including September 18,2009 in which to file its Respondent's Brief. In Support of this Motion, Respondent states as follows:

1. Respondent was served with the Corrected Appellant's Brief on or about July 20, 2009.
2. The Respondent's Brief is presently due on August 19,2009.
3. Respondent has requested no prior extension of time.
4. This extension will not prejudice Appellant or cause undue delay of the appeal process.
5. The extension of time is sought for good cause and not for purposes of vexation or delay, and specifically because Appellant has submitted a lengthy brief consisting of ten (10) separate Points Relied On.

6. In addition to the lengthy submission of the Appellant, the press of other business requires the Respondent to seek the requested extension of time.

WHEREFORE, for the above reasons, Respondent Husch Blackwell Sanders LLP respectfully requests that this Court grant an extension of time, **up** to and including September 18, 2009, in which to file its Respondent's Brief.

Respectfully Submitted By,

HUSCH BLACKWELL SANDERS LLP

By: J. Michael Thompson , MO #22153
Sean D. Tassi MO #59718
Husch Blackwell Sanders LLP
4801 Main Street, Suite 1000
Kansas City, Missouri 64112
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Attorneys for Respondent Husch Blackwell
Sanders LLP

CERTIFICATE OF SERVICE

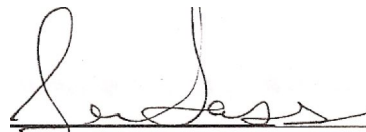
The undersigned hereby certifies that a true and accurate copy of the foregoing was forwarded this 18th day of August, 2009, by first class mail, postage prepaid to:

Samuel K. Lipari
3520 Akin Boulevard #918
Lee's Summit, Mo 64064-7910

John K. Power
Michael S. Hargens
Husch Blackwell Sanders
4801 Main Street, Suite 1000
Kansas City, MO 64112

Jay E. Heidrick
Polsinelli Shughart
32 Corporate Woods, Suite 1100
9225 Indian Creek Parkway
Overland Park, KS 66210

Mark A. Olthoff
William E. Quirk
Polsinelli Shughart
Twelve Wyandotte Plaza
120 W. 12th Street
Kansas City, MO 64105

A handwritten signature in black ink, appearing to read "Husch Blackwell Sanders", written over a horizontal line.

Attorneys for Respondent
Husch Blackwell Sanders LLP



Sean D. Tassi
Attorney

4801 Main Street, Suite 1000
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Dear Clerk:

Attached for filing please find a Motion for Extension of Time to File Respondent's Brief.

If you have any questions, please do not hesitate to contact me.

Sincerely,

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Sean D. Tassi

SDT/sm
Attachment

IN THE COURT OF APPEALS OF MISSOURI
WESTERN DISTRICT

SAMUEL K. LIPARI,

)

)

Appellant,

)

)

v.

)

Case No. WD 70832

)

NOVATION, LLC, et al.,

)

)

Respondents.

)

MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S BRIEF

Respondent Husch Blackwell Sanders LLP ("Respondent") by and through its attorneys of record, respectfully request that the Court grant them an additional thirty (30) days, up to and including September 18, 2009 in which to file its Respondent's Brief. In Support of this Motion, Respondent states as follows:

1. Respondent was served with the Corrected Appellant's Brief on or about July 20, 2009.
2. The Respondent's Brief is presently due on August 19, 2009.
3. Respondent has requested no prior extension of time.
4. This extension will not prejudice Appellant or cause undue delay of the appeal process.
5. The extension of time is sought for good cause and not for purposes of vexation or delay, and specifically because Appellant has submitted a lengthy brief consisting of ten (10) separate Points Relied On.

6. In addition to the lengthy submission of the Appellant, the press of other business requires the Respondent to seek the requested extension of time.

WHEREFORE, for the above reasons, Respondent Husch Blackwell Sanders LLP respectfully requests that this Court grant an extension of time, up to and including September 18, 2009, in which to file its Respondent's Brief.

Respectfully Submitted By,

HUSCH BLACKWELL SANDERS LLP

By: 
Michael Thompson MO #22153
Sean D. Tassi MO #59718
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sean.tassi@huschblackwell.com

Attorneys for Respondent Husch Blackwell
Sanders LLP

CERTIFICATE OF SERVICE

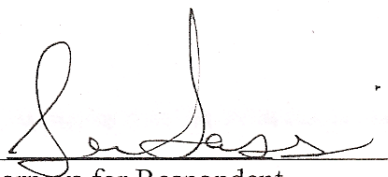
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William E. Quirk
Polsinelli Shughart
Twelve Wyandotte Plaza
120 W. 12th Street
Kansas City, MO 64105

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Attorneys for Respondent
Husch Blackwell Sanders LLP