

IN THE SUPREME COURT OF THE STATE OF MONTANA

No. DA 17-0601

CITY OF GREAT FALLS,

Plaintiff and Appellee,

v.

JEFFERY JOHN LOCH,

Defendant and Appellant.

**MOTION FOR EXTENSION OF TIME
WITH AFFIDAVIT IN SUPPORT**

COMES NOW, Haley Connell Jackson, Assistant Appellate Defender for the Appellate Defender Division, and respectfully requests an extension of time until October 22, 2018, in which to prepare, file, and serve the Appellant's opening brief in the above-entitled matter. This is Appellant's tenth request for an extension. Appellant's opening brief was first due December 21, 2017. Appellant's opening brief is presently due September 21, 2018. Appellant submits the attached affidavit in support of this motion.

Opposing counsel has been contacted and has no objection.

Respectfully submitted this 14th day of September, 2018.

OFFICE OF THE PUBLIC DEFENDER
APPELLATE DEFENDER DIVISION
555 Fuller Ave.
P.O. Box 200147
Helena, MT 59620-0147

By: /s/ Haley Connell Jackson
HALEY CONNELL JACKSON
Assistant Appellate Defender

[illegible]

I, Haley Connell Jackson, in compliance with M.R. App. P. 26(2),
declare:

1. I am a licensed, practicing attorney in the State of Montana, and I am currently employed by the Appellate Defender Division (ADD) as an Assistant Appellate Defender.

2. I was assigned to handle *State v. Loch* (DA 17-0601).

3. Appellant's opening brief was first due December 21, 2017. The brief is currently due September 21, 2018. This is ADD's tenth extension request, but only the fourth request I have personally made since being assigned the case.

4. I have been unable to complete the opening brief in this appeal because I have been working on older pending matters including, primarily, *State v. Lowry* (DA 17-0413) (opening brief to be filed Monday, September 17, 2018), *State v. Collins* (DA 17-0528) (opening brief due September 28, 2018), and *State v. Weik* (DA 16-0664) (petition for rehearing filed September 13, 2018). I am also counsel in

State v. Rogers (DA 17-0500), *State v. Windsor* (DA 16-0481, 17-0363),
State v. Sawyer (DA 16-0753), *State v. Johns* (DA 17-0287), *State v.*
Anderson (DA 17-0724, 17-0725), *State v. Funkhouser* (DA 17-0697),
and *State v. Gotschall* (DA 17-0732).

5. I have begun my review of the record. Additional time is necessary to complete my review of the record, research the law, and draft an opening brief. Once I file the opening briefs in *State v. Lowry* and *State v. Collins* this case will be my top priority.

6. Opposing counsel has been contacted and does not object to this request.

7. I declare under penalty of perjury that the above is true and correct.

/s/ Haley Connell Jackson
Haley Connell Jackson
Bozeman, Montana

September 14, 2018
Date

CERTIFICATE OF SERVICE

I, Haley Connell Jackson, hereby certify that I have served true and accurate copies of the foregoing Motion - Unopposed - Motion and Affidavit for Second or Subsequent Extension to the following on 09-14-2018:

Timothy Charles Fox (Prosecutor)
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Electronically signed by Kim Harrison on behalf of Haley Connell Jackson
Dated: 09-14-2018