

IN THE SUPREME COURT OF THE STATE OF MONTANA

No. DA 19-0020

STATE OF MONTANA,

Plaintiff and Appellee,

v.

JACOB ANDREW SAUNDERS,

Defendant and Appellant.

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

COMES NOW, Chad Wright, Appellate Defender for the Appellate Defender Division (ADD), and respectfully requests an extension of time until July 24, 2019, in which to prepare, file, and serve the Appellant's opening brief in the above-entitled matter. This is Appellant's second request for an extension. Appellant's opening brief was first due May 23, 2019. Appellant's opening brief is currently due June 24, 2019. 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 June, 2019.

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

By: /s/ Chad Wright
CHAD WRIGHT
Appellate Defender

[illegible]

I, Chad Wright, 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 the Appellate Defender Division Administrator.

2. Pursuant to ADD's statutory and constitutional obligations, cases are assigned to internal ADD attorneys or outside contract counsel. Until the start of the next fiscal year, ADD will continue to maintain an open vacancy and must restrict the assignment of criminal appeals to outside counsel. I am attempting to identify which ADD attorney is best able to assume responsibility for the above-entitled appeal given the attorney's individual caseload.

3. Additional time will be needed for assigned counsel to be able to provide effective assistance of counsel.

4. Opposing counsel has been contacted concerning this motion and does not object.

/s/ Chad Wright
Chad Wright, Helena, MT

June 14, 2019
Date

CERTIFICATE OF SERVICE

I, Chad M. Wright, 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 06-14-2019:

Martin D. Lambert (Prosecutor)
1709 W. College
Bozeman MT 59715
Representing: State of Montana
Service Method: eService

Timothy Charles Fox (Prosecutor)
Montana Attorney General
215 North Sanders
PO Box 201401
Helena MT 59620
Representing: State of Montana
Service Method: eService

Electronically signed by Gerri Lamphier on behalf of Chad M. Wright
Dated: 06-14-2019