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Case Number: DA 19-0077

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IN THE SUPREME COURT OF THE STATE OF MONTANA Supreme Court Cause No. DA 19-0077

ALEXIS NUNEZ and HOLLY McGOWAN,

Plaintiffs/Appellees,

v.

WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC.; CHRISTIAN CONGREGATION OF JEHOVAH'S WITNESSES and THOMPSON FALLS CONGREGATION OF JEHOVAH'S WITNESSES,

Defendants/Appellants.

UNOPPOSED MOTION FOR EXTENSION OF TIME

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WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC.; CHRISTIAN CONGREGATION OF JEHOVAH'S WITNESSES and THOMPSON FALLS CONGREGATION OF JEHOVAH'S WITNESSES,

Third-Party Plaintiffs/Appellants,

v.

MAXIMO NAVA REYES and IVY McGOWAN-CASTLEBERRY,

Third-Party Defendants/Appellees.

Pursuant to Montana Rule of Appellate Procedure 26(2), Defendants/Third-Party Plaintiffs/Appellants Watchtower Bible and Tract Society of New York, Inc., Christian Congregation of Jehovah's Witnesses, and Thompson Falls Congregation of Jehovah's Witnesses respectfully move the Court for a nine-day extension from August 5, 2019, up to and including August 14, 2019, in which to file their Reply Brief in this matter.

As set forth in the accompanying Affidavit of Tessa A. Keller, Appellants have substantial need for this extension as the appeal involves critical and complex legal questions, including the constitutionality of the statutory cap on punitive damages, as well as procedural questions raised by Appellees in their Response Brief. Appellants have been diligently working to analyze and address the issues

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raised by Appellees, including a comprehensive review of the record and law on multiple issues.

Counsel for Appellees have been contacted and do not oppose this motion.

DATED this 26th day of July, 2019.

/s/ Tessa A. Keller
Attorneys for Appellants

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CERTIFICATE OF SERVICE

I, Tessa Anne Keller, hereby certify that I have served true and accurate copies of the foregoing Motion - Unopposed - Extension of Time - Brief to the following on 07-26-2019:

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Electronically signed by Jackie D Lawrenson on behalf of Tessa Anne Keller Dated: 07-26-2019