

07/26/2019

Bowen Greenwood  
CLERK OF THE SUPREME COURT  
STATE OF MONTANA

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.

**AFFIDAVIT OF  
TESSA A. KELLER**

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.

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STATE OF MONTANA )

:ss

County of Missoula )

TESSA A. KELLER, being first duly sworn upon oath, deposes and says:

1. I am an attorney for Defendants/Third-Party Plaintiffs/Appellants Watchtower Bible and Tract Society of New York, Inc. ("Watchtower"), Christian Congregation of Jehovah's Witnesses ("Christian Congregation"), and Thompson Falls Congregation of Jehovah's Witnesses.

2. This affidavit is offered in support of Appellants' Motion for Extension of Time (Unopposed).

3. Appellants' Reply Brief is currently due August 5, 2019.

4. Appellants request an additional nine-day extension, up to and including August 14, 2019, in which to file their Reply Brief.

5. An additional extension is necessary because of the number and complexity of the issues raised by Appellants in their Opening Brief and the substantive and procedural issues argued by the Appellees in their Response Brief.

6. This case presents complex issues relating to statutory and constitutional law, as well as civil procedure.

7. Appellants request additional time to ensure that responses to new issues raised by Appellees, including whether issues were adequately preserved for appeal, are thoroughly researched, presented and analyzed to the Court.

8. Appellants have exercised diligence in reviewing and analyzing Appellee's Response Brief, and in drafting their Reply Brief. Appellants seek a nine-day extension of time to ensure that all the issues are thoroughly and accurately presented to this Court. This extension will still allow the Court and parties adequate time to prepare for oral argument, currently set for September 13, 2019.

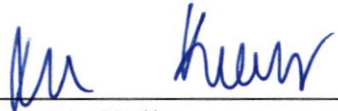
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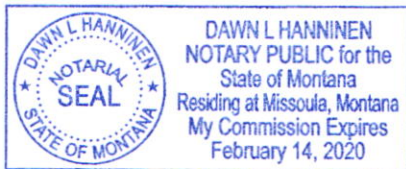
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9. Counsel for Appellees do not oppose the Motion for Extension of Time.

DATED this 26th day of July, 2019.

  
\_\_\_\_\_  
Tessa A. Keller

SUBSCRIBED TO AND SWORN before me this 26th day of July, 2019, by Tessa A. Keller.



  
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NOTARY PUBLIC for the State of Montana