

IN THE SUPREME COURT OF THE STATE OF MONTANA

No. DA 19-0157

STATE OF MONTANA,

Plaintiff and Appellee,

v.

JACQUELINE BLACK,

Defendant and Appellant

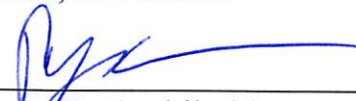
**MOTION FOR EXTENSION OF TIME
WITH AFFIDAVIT IN SUPPORT**

COMES NOW, Ryan P. Archibald, Attorney of Record for Appellant in the above matter, and hereby respectfully requests an extension of time until May 1, 2020, in which to prepare, file, and serve the Appellant's opening brief in the above-entitled matter. This is the Appellant's eleventh request for an extension. Appellant's opening brief was first due May 23, 2019. Appellant's opening brief is currently due March 27, 2020. Appellant submits the attached affidavit in support of this motion.

Opposing counsel has been contacted and has no objection to an extension of time.

Respectfully submitted on this 19th day of March, 2020.

Ryan P. Archibald
Bitterroot Law, PLLC
107 S. 2nd St.
P.O. Box 1312
Hamilton, MT 59840

By: 

Ryan P. Archibald
Attorney for Appellant

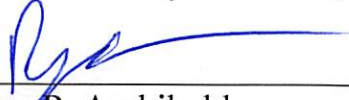
County of Ravalli

)

1. I am a licensed, practicing attorney in the State of Montana, and I am currently employed by Bitterroot Law, PLLC.
2. I have been appointed to represent Appellant in this matter by the Office of the State Public Defender, Appellate Defender Division.
3. I was appointed to this matter on December 9, 2019.
4. I have reviewed the record for appeal.
5. I then notified the District Court of missing audio recordings that were admitted as evidence.
6. I have received the missing audio, I have now had the opportunity to review the audio, but I need to further review the portions played at trial.
7. I have been required to review the record multiple times in order to fully understand the issues for appeal.
8. Due to the complexity of issues I need more time to research issues for appeal and write the opening brief.
9. I have begun to write the brief, but in the process I have discovered a new issue for appeal that needs to be researched and briefed.

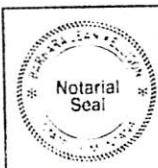
10. Opposing counsel has been contacted concerning this motion and does not object.

DATED this 19th day of March, 2020




Ryan P. Archibald
Attorney for Appellant

SUBSCRIBED AND SWORN to before me on this 19th day of March, 2020.



(Seal)
BARBARA JEAN KELLISON
Notary Public for the
State of Montana
Residing at VICTOR, MT
My Commission Expires
December 12, 2022



Notary Public for the State of Montana
Printed: Barbara Jean Kellison

CERTIFICATE OF SERVICE

I, Ryan Phillip Rebhahn Archibald, hereby certify that I have served true and accurate copies of the foregoing Motion - Unopposed - Motion and Affidavit for Extension to the following on 03-19-2020:

Chad M. Wright (Attorney)
P.O. Box 200147
Helena MT 59620-0147
Representing: Jacqueline Black
Service Method: eService

Kathryn McEnery (Prosecutor)
409 Missouri Avenue
Deer Lodge MT 59722
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: Ryan Phillip Rebhahn Archibald
Dated: 03-19-2020