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IN THE SUPREME COURT OF THE STATE OF MONTANA  
Supreme Court Cause No. DA 20-0052

GARY AND CAROLYN KAUL,  
  
Plaintiffs and Appellants,

v.

STATE FARM MUTUAL  
AUTOMOBILE INSURANCE  
COMPANY,

Defendant and Appellee.

**UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE  
APPELLEE STATE FARM  
MUTUAL AUTOMOBILE  
INSURANCE COMPANY'S  
RESPONSE BRIEF**

Appellee State Farm Mutual Automobile Insurance Company (“State Farm”), hereby moves under Montana Rule of Appellate Procedure 26(2) for a 30-day extension from July 6, 2020, up to and including August 5, 2020, in which to file its response to Appellants’ Opening Brief in this matter.

State Farm informs the Court that the original deadline to file its response brief was June 5, 2020. State Farm received an extension until July 6, 2020 to file

its brief. The reason for additional extension is due to administrative difficulties and partial closures as a result of the coronavirus pandemic. Aff. Katelyn J. Hepburn ¶ 3, June 25, 2020. Upon recommendations from the federal and state government and the guideline limiting contact with other people, the offices of Garlington, Lohn & Robinson, PLLP, have been partially closed for many months, sending a significant portion of its staff home, while seeking remote work alternatives. Aff. Hepburn ¶ 3. In addition, the amount of work and overall scope of State Farm's response is increased in light of the appearance by Amicus Curia Montana Trial Lawyers Association, the submission of a separate brief, and the focus upon issues of first impression in the state. Given the burden these circumstances have created, additional time is needed to complete and file the response brief.

In accordance with Montana Rules of Appellate Procedure 16(1) and 26(2), Appellants' counsel has been contacted and does not object to this motion.

DATED this 25th day of June, 2020.

/s/ Katelyn J. Hepburn  
Attorneys for Appellee

## CERTIFICATE OF SERVICE

I, Katelyn Jennifer Hepburn, hereby certify that I have served true and accurate copies of the foregoing Motion - Unopposed to the following on 06-25-2020:

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Electronically signed by Jackie D Lawrenson on behalf of Katelyn Jennifer Hepburn  
Dated: 06-25-2020