

08/07/2020

Bowen Greenwood  
CLERK OF THE SUPREME COURT  
STATE OF MONTANA

Case Number: DA 19-0526

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Attorney for Defendant and Appellant

IN THE SUPREME COURT OF THE STATE OF MONTANA

No. DA 19-0526

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THOMAS WILLIAM PRICE,  
  
Defendant and Appellant,

v.

STATE OF MONTANA,  
  
Plaintiff and Appellee.

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**UNOPPOSED MOTION FOR EXTENSION OF TIME AND  
DECLARATION IN SUPPORT**

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The Appellant, Thomas Price, respectfully requests a 60-day extension of time until October 13, 2020, in which to prepare, serve, and file his reply brief in the above entitled matter. In support of this motion, undersigned counsel respectfully submits the following Declaration.

Respectfully submitted this 7<sup>th</sup> day of August 2020.

ATTORNEY FOR THOMAS PRICE  
HULL, SWINGLEY & BETCHIE, P.C.

By: /s/ Christopher R. Betchie  
CHRISTOPHER R. BETCHIE

**DECLARATION**

Pursuant to Mont. Code Ann. § 1-6-105, I, Christopher R. Betchie, hereby declare as follows:

1. I am a licensed, practicing attorney in the State of Montana, and am currently employed by Hull, Swingley & Betchie, P.C. as a named Partner.
2. In my capacity as a Partner with Hull, Swingley & Betchie, P.C. I have been retained as counsel for Thomas Price.
3. Mr. Price's Appellant Reply Brief is currently due August 14, 2020.
4. Due to my current work load, and my previously scheduled personal vacation I cannot meet the deadline for filing Mr. Price's Reply Brief. My work load does not include any other Montana Supreme Court cases, but several trials, mediations, and other hearings over the course of the next 60 days.
5. Opposing counsel has been contacted concerning this motion and does not object.
6. I will work diligently to complete the matter in the time requested.

7. I hereby declare under the penalty of perjury under the laws of the United States of America and the State of Montana that the Foregoing is true and correct.

Respectfully submitted this 7<sup>th</sup> day of August 2020.

ATTORNEY FOR THOMAS PRICE  
HULL, SWINGLEY & BETCHIE, P.C.

By: /s/ Christopher R. Betchie  
CHRISTOPHER R. BETCHIE

## CERTIFICATE OF SERVICE

I, Christopher R. Betchie, hereby certify that I have served true and accurate copies of the foregoing Motion- Unopposed to the following on 08-07-2020:

Leo Gallagher (Prosecutor)  
Deputy Lewis and Clark County Attorney  
228 Broadway  
Helena, MT 59601  
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 Christopher Betchie Dated: 08-07-2020