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Attorney for Appellant

IN THE SUPREME COURT OF THE STATE OF MONTANA

Cause No. DA-20-0364

BLAKE WILLIAM AMBERSON,

Appellant,

v.

DENIE JEAN AMBERSON,

Appellee.

UNOPPOSED MOTION TO EXTEND MEDIATION DEADLINE

Appellant, Blake Amberson, by and through his counsel of record, hereby respectfully requests a 60-day extension of time, until November 30, 2020, in which to mediate this matter pursuant to M.R.App.R. 7.

The current deadline to mediate this matter is September 30, 2020. On July 22, 2020, the parties scheduled mediation for today at

9:00 a.m. Due to concerns with the pandemic, Appellant and his counsel subsequently asked Appellee and her counsel to mediate virtually via Zoom, to which they objected. Accordingly, today's mediation was scheduled to occur in-person.

Yesterday, counsel for Appellant again requested that the parties mediate virtually via Zoom due to concerns with Appellant's potential recent exposure to Covid-19. Specifically, Appellant's father, with whom Appellant has in-person contact with approximately 4-5 days per week, was tested for Covid-19 on Friday but did not have the results as of yesterday (or today). Appellant again objected to a virtual mediation.

As a result, and in order to protect all involved parties' health, including the mediator's health and the health of those who share the office space where mediation was scheduled to occur, Appellant respectfully requests up to a 60-day extension to mediate this matter. Appellant also requests that all time requirements that were held in abeyance pursuant to the parties' *Stipulation to Hold Time Requirements In Abeyance Pending Appellate Mediation* filed on August 17, 2020, also be extended to the date of the filing of the mediator's report.

Counsel for Appellee has been contacted regarding Appellant's request to extend the mediation deadline for up to 60 days and has no objection to the same.

RESPECTFULLY SUBMITTED this 28th day of September, 2020.

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By: /s/ Carrie R. Wasserburger
Attorney for Appellant

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of September, 2020, a true and correct copy of the foregoing document was duly served upon the following individuals at the address, and in the manner, indicated:

Brad Belke, *Attorney for Respondent*
via email to b.l.belke@gmail.com

By: /s/ Carrie R. Wasserburger
Attorney for Appellant

CERTIFICATE OF SERVICE

I, Carrie Randall Wasserburger, hereby certify that I have served true and accurate copies of the foregoing Motion - Unopposed to the following on 09-28-2020:

Brad Lee Belke (Attorney)
444 E. Park St.
P.O. Box 4079
Butte MT 59702
Representing: Denie Jean Amberson
Service Method: E-mail Delivery

Electronically Signed By: Carrie Randall Wasserburger
Dated: 09-28-2020