

## IN THE SUPREME COURT OF THE STATE OF MONTANA

No. DA 20-0107

---

STATE OF MONTANA,

Plaintiff and Appellee,

v.

MICHAEL ALLEN ZEIMER,

Defendant and Appellant.

---

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

---

Samir F. Aarab, appointed counsel for Appellant Michael Allen Zeimer, respectfully requests an extension of time until March 18, 2021, in which to prepare, file, and serve the Appellant's opening brief in the above-captioned matter. This is the Appellant's tenth request for an extension. Appellant's opening brief is presently due on February 18, 2021. Appellant submits the attached affidavit in support of this motion.

Respectfully submitted this 11th day of February, 2021.

By: /s/ Samir F. Aarab  
Boland Aarab PLLP  
11 5th St N, Suite 207  
Great Falls, MT 59401

sfaarab@bolandaarab.com  
*Attorney for Appellant*

STATE OF MONTANA            )  
  : ss.  
County of Cascade            )

I, Samir F. Aarab, pursuant to Mont. Code Ann. §§ 1-1-203, 1-6-105, declare:

1. I am a licensed, practicing attorney in the State of Montana, and I am a partner in the law firm Boland Aarab PLLP.

2. I am a contract attorney with the Office of the Appellate Defender (OAD). On December 21, 2020, I was appointed by the OAD to represent the Appellant in this matter.

3. Due to my current caseload, I require a continuance to adequately review the record in the case and brief any appealable issues.

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

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Samir F. Aarab  
Samir F. Aarab, Great Falls, MT

February 11, 2021  
Date

## **CERTIFICATE OF SERVICE**

I, Samir F. Aarab, hereby certify that I have served true and accurate copies of the foregoing Motion and Affidavit for Extension to the following on February 11, 2021:

Timothy Charles Fox (Prosecutor)  
Montana Attorney General  
215 North Sanders  
PO Box 201401  
Helena, MT 59620  
Representing: State of Montana  
Service Method: eService

Chad Wright (Attorney)  
Office of the Public Defender  
Appellate Defender Division  
555 Fuller Ave  
P.O. Box 200147  
Helena, MT 59620

## **CERTIFICATE OF SERVICE**

I, Samir F. Aarab, hereby certify that I have served true and accurate copies of the foregoing Motion - Unopposed to the following on 02-11-2021:

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

Austin Miles Knudsen (Govt Attorney)  
215 N. Sanders  
Helena MT 59620  
Representing: State of Montana  
Service Method: eService

Brett Irigoin (Attorney)  
121 S. Douglas Avenue  
Glendive MT 59330  
Representing: State of Montana  
Service Method: Conventional

Electronically Signed By: Samir F. Aarab  
Dated: 02-11-2021