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IN THE SUPREME COURT OF THE STATE OF MONTANA
Case No. DA-20-0418

WADE AYALA,

Plaintiff, Counter-claim Defendant, and Appellee

v.

GAIL STAFFORD,

Defendant, Counter-Claimant, Third-Party Plaintiff, Appellant, and Cross-Appellee,

v.

RECONTRUST COMPANY, N.A.; BANK OF AMERICA, N.A.; FEDERAL NATIONAL MORTGAGE ASSOCIATION, and EQUITY PROCESS MANAGEMENT, INC.

Third-Party Defendants, Appellees, and Cross Appellants,

SADIE LYNN BARRETT, and DOES 1 - 10,

Third Party Defendants and Appellees.

APPELLANT GAIL STAFFORD'S UNOPPOSED MOTION FOR EXTENSION
OF TIME TO FILE RESPONSES AND ANY REPLIES

Appellant Gail Stafford (“Stafford”) respectfully moves this Court pursuant to Mont. R. App. P. 26(1) for thirty-day extensions of time to file her Responses and any Replies to the Answers and Cross-Appeals filed by Appellees and Cross Appellants, ReconTrust Company, N.A., Bank of America, N.A., Federal National Mortgage Association and Equity Process Management, Inc., and to file any Reply to the Answer filed by Appellee, Wade Ayala (“Ayala”), in response to Stafford’s Opening Brief. Absent the requested extensions, any Reply by Stafford to Ayala’s Answer would have been due on February 12, 2021 and Stafford’s Responses and any Replies to the remaining parties’ Answers and Cross-Appeals would be due on March 1, 2021. With the requested extensions, any Reply by Stafford to Ayala’s Answer will be due on March 15, 2021 and Stafford’s Responses and any Replies to the remaining parties’ Answers and Cross-Appeals will be due on March 31, 2021.

Stafford asserts good cause exists for granting this Motion due to the number of briefs that must be prepared and her counsel’s very full calendar, which will make it difficult for counsel to prepare and file Stafford’s Responses and any Replies by the current deadlines. Counsel’s calendar has recently been inundated with, among others, (1) a 135-page Complaint in another complex multi-party litigation, and (2) a

number of other deadlines. Due to counsel's heavily packed calendar, Stafford is requesting additional time to prepare and file her Responses and Replies, if any.

Pursuant to Mont. R. App. P. 26(1), on Monday, February 8, 2021, opposing counsel for all parties were contacted regarding this motion and indicated they had no objection to the thirty-day extensions. Having shown good cause exists, Stafford requests the Court grant her Unopposed Motion for Extension of Time to File Responses and Replies, if any. For the Court's convenience, a proposed order is filed herewith.

Dated this 17th day of February 2021.

GRANITE PEAK LAW, PLLC

By: /s/ Adam H. Owens

Attorneys for Appellant

CERTIFICATE OF SERVICE

I, Adam H. Owens, certify that a true and accurate copy of the foregoing *Appellant Gail Stafford's Unopposed Motion for Extension of Time to File Responses and Replies*, if any, was served to the following on February 17, 2021 through the Montana Supreme Court Electronic Filing System and via email:

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By: _____ /s/ Adam H. Owens

CERTIFICATE OF SERVICE

I, Adam H. Owens, hereby certify that I have served true and accurate copies of the foregoing Motion - Unopposed to the following on 02-17-2021:

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Electronically Signed By: Adam H. Owens
Dated: 02-17-2021