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COUNSEL FOR PLAINTIFF AND APPELLEE

IN THE SUPREME COURT OF THE STATE OF MONTANA

No. DA 21-0070

STATE OF MONTANA,

Plaintiff and Appellee,

v.

CAMERON MASON STONE,

Defendant and Appellant.

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

The Appellee, State of Montana, respectfully requests a 30-day extension
of time until June 2, 2021, in which to prepare, serve, and file its response brief

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in the above-entitled matter. In support of this motion, undersigned counsel respectfully submits the following Declaration.

Respectfully submitted this 26th day of April, 2021.

AUSTIN KNUDSEN
Montana Attorney General
Justice Building
P.O. Box 201401
Helena, MT 59620-1401

By: /s/ Michael P. Dougherty
MICHAEL P. DOUGHERTY
Assistant Attorney General

DECLARATION

Pursuant to Mont. Code Ann. § 1-6-105, I, Michael P. Dougherty, hereby declare as follows:

1. I am a licensed, practicing attorney in the State of Montana. I am currently employed by the Montana Department of Justice, Office of the Attorney General, Appellate Services Bureau.
2. The State's response brief was first due on April 3, 2021. The brief is presently due May 3, 2021. I am requesting an extension of time until June 2, 2021. This is the State's second request for an extension.
3. In my capacity as Assistant Attorney General, I was assigned to handle the above-entitled matter on March 31, 2020. Due to my current workload, I have not had time to sufficiently review the matter and prepare a response.

4. I have recently completed response briefs in *Two Leggins v. Hardin City Court, et al.*, OP-21-0047; and *Rood v. Laughlin*, DA 20-0553. In addition to the above-entitled matter, I am also preparing response briefs in the following matters: *State v. Pedersen*, DA 20-0042; *State v. Yeaton*, DA 20-0041; *State v. T. Smith*, DA 19-0477; *State v. Vasquez*, DA 19-0715; *In re C.L.*, DA 20-0155; *State v. Payne*, DA 19-0371; and *State v. Martell*, DA 21-0037.

5. I will work diligently to complete the matter in the time requested, if not before.

6. Mr. Stone is incarcerated and acting pro se. Accordingly, he has not been contacted concerning this motion.

7. I hereby declare under 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 26th day of April, 2021.

/s/ Michael P. Dougherty
MICHAEL P. DOUGHERTY

CERTIFICATE OF SERVICE

I, Michael Patrick Dougherty, hereby certify that I have served true and accurate copies of the foregoing Motion - Motion and Affidavit for Second or Subsequent Extension to the following on 04-26-2021:

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

Scott D. Twito (Govt Attorney)
Yellowstone County Attorney's Office
PO Box 35025
Billings MT 59107
Representing: State of Montana
Service Method: eService

Cameron Mason Stone (Appellant)
Inmate 3025098
Montana State Prison
700 Conley Lake Road
Deer Lodge MT 59722
Service Method: Conventional

Electronically signed by Kimberly Wollitz on behalf of Michael Patrick Dougherty
Dated: 04-26-2021