

**ORIGINAL****FILED**

06/09/2021

Bowen Greenwood  
CLERK OF THE SUPREME COURT  
STATE OF MONTANA

Case Number: DA 20-0614

1 Robyn L. Weber, Esq.  
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7 Attorney for Appellant and Respondent  
8 WAYNE DARRELL DAILEY

**FILED**

JUN 09 2021

Bowen Greenwood  
Clerk of Supreme Court  
State of Montana

9 IN THE SUPREME COURT OF THE  
10 STATE OF MONTANA

11 IN RE THE ADOPTION OF:

12 R.D.J, A Minor Child,

13 WAYNE DARRELL DAILEY

14 Respondent/Appellant,

15 v.

16 JEREMY JAMES,

17 Petitioner/Appellee.

Cause No. DA 20-0614

**MOTION FOR EXTENSION  
OF TIME TO FILE APPELLANT'S  
FINAL REPLY BRIEF**

19 COMES NOW the Respondent/Appellant, WAYNE DARRELL DAILEY, by and through  
20 his counsel of record, Robyn L. Weber, and hereby files his Motion for Extension of Time by which  
21 to file his Final Reply Brief in the above-referenced case. This motion is made and based upon the  
22 current heavy workload in the office of the undersigned counsel. The current due date for the filing  
23 of the Reply Brief is June 14, 2021. It is respectfully requested that the undersigned counsel would  
24 have an additional 14 days to prepare and file the Reply Brief, which would make the new due date  
25 June 28, 2021.


1 Opposing counsel has been contacted, and objects to this request for the reasons stated in his  
2 email on today's date, a copy of which is attached hereto as **Exhibit A**.

3 An additional two (2) weeks is not a lengthy extension, and would be greatly helpful in  
4 managing the workload of the undersigned counsel. It would be appreciated if the Court would grant  
5 this reasonable request over the objection of the Petitioner/Appellee.

6 A proposed Order is provided for the Court's convenience.

7 SO DATED this 9<sup>th</sup> day of June, 2021.  
8

9 RESPECTFULLY SUBMITTED:

10 

11 Robyn L. Weber  
12 Attorney for Respondent/Appellant  
13 WAYNE DARRELL DAILEY

14 **CERTIFICATE OF SERVICE BY MAILING**

15 I hereby certify that on the 9<sup>th</sup> day of June, 2021, I duly served a true and correct copy of the  
16 foregoing **MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S FINAL REPLY**  
17 **BRIEF** upon the parties listed below by inserting the same in a stamped, pre-addressed envelope and  
18 mailing it via the United States Postal Service in Helena, Montana to:

19 Brad Belke  
20 Attorney at Law  
21 PO Box 4079  
22 Butte MT 59702

23 By: 

24 Robyn L. Weber  
25

**Robyn Weber**

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**From:** Robyn Weber  
**Sent:** Wednesday, June 9, 2021 11:21 AM  
**To:** Brad Belke  
**Cc:** Angela Blixt  
**Subject:** Re: final reply brief

Ok thanks, I'll note your objection.

Sent from my Verizon, Samsung Galaxy smartphone  
Get [Outlook for Android](#)

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**From:** Brad Belke <b.l.belke@gmail.com>  
**Sent:** Wednesday, June 9, 2021 11:15:01 AM  
**To:** Robyn Weber <Robyn@weberlawhelena.com>  
**Cc:** Angela Blixt <Angela@weberlawhelena.com>  
**Subject:** Re: final reply brief

Yes we object. My client was very distressed with the 2 extensions you received already. As a result I completed my brief in a prompt manner and see no reason why I can do a mandatory brief in 7 days and you can't do an optional brief in 14. No offense intended.

Brad

On Wed, Jun 9, 2021, 10:07 AM Robyn Weber <[Robyn@weberlawhelena.com](mailto:Robyn@weberlawhelena.com)> wrote:

Brad, my deadline for the final reply brief is Monday, June 14<sup>th</sup>. I'd like to have 2 weeks additional, making the new deadline Monday, June 28<sup>th</sup>.

Do you have any objection to that?

Thanks, Robyn

