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COUNSEL FOR PLAINTIFF AND APPELLEE

IN THE SUPREME COURT OF THE STATE OF MONTANA

No. DA 20-0268

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STATE OF MONTANA,

Respondent and Appellee,

v.

DESIRAE ELLEN MCDONOUGH,

Petitioner and Appellant.

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**UNOPPOSED MOTION FOR EXTENSION OF TIME**

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The Appellee, State of Montana, respectfully requests a 30-day extension of time until October 26, 2021, in which to prepare, serve, and file its response brief in the above-entitled matter. The brief is presently due on September 26, 2021, and this is the State's first extension request.

This motion is made due to the heavy workload under which the attorney assigned to this case is presently working, making it impossible to properly research, consider, and brief the issues raised by the Appellant within the time allotted.

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

Respectfully submitted this 20th day of September, 2021.

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P.O. Box 201401  
Helena, MT 59620-1401

By: /s/ Mardell Ployhar  
MARDELL PLOYHAR  
Assistant Attorney General

## **CERTIFICATE OF SERVICE**

I, Mardell Lynn Ployhar, hereby certify that I have served true and accurate copies of the foregoing Motion - Unopposed to the following on 09-20-2021:

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

Haley Connell Jackson (Attorney)  
Office of the Appellate Defender  
555 Fuller Avenue  
Helena MT 59620  
Representing: Desirae Ellen McDonough  
Service Method: eService

Marcia Jean Boris (Attorney)  
Lincoln County Attorney  
512 California Avenue  
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Representing: State of Montana  
Service Method: Conventional

Electronically signed by Dia Lang on behalf of Mardell Lynn Ployhar  
Dated: 09-20-2021