

ORIGINAL

FILED

09/30/2021

Bowen Greenwood
Form 16(2)
CLERK OF THE SUPREME COURT
STATE OF MONTANA

Case Number: DA 21-0017

Christina M. Stevens
Name

225 Karraw Ave

White Sulphur, MT 59937
City State Zip

ChristinaStevensMT@gmail.com
[e-mail address]

Appellee
[Designation of Party]

FILED

SEP 30 2021

Bowen Greenwood
Clerk of Supreme Court
State of Montana

IN THE SUPREME COURT OF THE STATE OF MONTANA

No. DA 21-0017

[to be assigned by Clerk of Supreme Court]

Robert A. Stevens,

Appellant,

v.

Christina M. Stevens,

Appellee.

**RESPONSE AND
OBJECTION TO
MOTION**

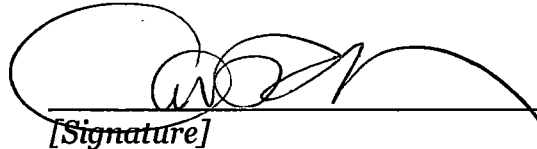
[Use this form to respond and oppose a motion the opposing party has filed. M. R. App P. 16(2)].

I object to the Court granting this motion for the following reasons:

See attached pages 1+2



DATED this 23 day of September, 2021.


[Signature]

Christina Stevens
[Print name]

CERTIFICATE OF SERVICE

I certify that I have filed this **Response and Objection to Motion** with the Clerk of the Supreme Court and that I have mailed or hand delivered a copy to each attorney of record and any other party not represented by counsel as follows:

Robert A. Stevens
[Name of opposing counsel]

107 Cardiff Ave

Kalispell MT 59901
[Address]

Counsel for Appellant

[Other party representing himself or herself]

[Address]



DATED this 03 day of September, 2021.

Christina Sodens
[Name]
[Signature]
[Print name]



Christina Stevens
Name
225 Karrow Ave
Whitefish, MT 59937
City State Zip
christinastevensmt@gmail.com
{e-mail address}
Appellee
{Designation of party}

IN THE SUPREME COURT OF THE STATE OF MONTANA

No. DA 21-0017

{to be assigned by Clerk of Supreme Court}

Christina M. Stevens

Appellee,

**RESPONSE AND OBJECTION TO
MOTION**

v.

Robert A. Stevens

Appellant,

{Use this form to respond and oppose a motion the opposing party has filed. M. R. *App P. 16(2)*. Appellee objects to the Appellants request asking the Court granting a motion for a 4th extension of time. The Appellee also asked the Court to dismiss this appeal in accordance with the warning issued on the 3rd motion of extension of time stating: "No further extensions will be granted. Failure to file the brief within that time will result in the dismissal of this appeal with prejudice and without further notice."

The Appellant has been blatantly abusing the extension of time through the appeal process. The Appellant has repeatedly asked and has been granted 3 extensions of time and was made aware that no other extensions would be allowed and that the Appellants opening brief needed to be submitted by the September 20th, 2021 timeframe. The Appellant has not been truthful or forthcoming in his need for time continuance, nor his obligation to send notifications to the Appellee as specifically outlined in the Civil Handbook when working Pro Se. The Appellants claim in the last motion is untrue regarding the Appellee moving without notice. The Appellant was made well aware over 30 days prior to the move that due to financial strains from a lengthy and costly divorce as well as a significant rent increase the Appellee was not longer able to afford to reside in the Flathead Valley. The parties two children were not left unknowingly with Appellant. The oldest child (18 yrs) is no longer a minor and is living in

Bozeman attending Montana State University. The youngest child (15 1/2 yrs) was part of the decision process regarding the move of the Appellee with the Appellants knowledge and agreement.