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COUNSEL FOR PLAINTIFF AND APPELLEE

IN THE SUPREME COURT OF THE STATE OF MONTANA

No. DA 20-0064

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STATE OF MONTANA,

Plaintiff and Appellee,

v.

RONALD ALAN HUMMEL,

Defendant and Appellant.

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

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The Appellee, State of Montana, respectfully requests a 30-day extension of time until February 7, 2022, in which to prepare, serve, and file its response brief

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

Respectfully submitted this 3rd day of January, 2022.

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

By: /s/ Jonathan Krauss  
JONATHAN KRAUSS  
Assistant Attorney General

### **DECLARATION**

Pursuant to Mont. Code Ann. § 1-6-105, I, Jonathan M. Krauss, hereby declare as follows:

1. I am a licensed, practicing attorney in the State of Montana; am employed as an Assistant Attorney General; and was assigned this case on appeal.
2. The State's Appellee's Brief was first due on November 8, 2021. The brief is presently due on January 7, 2022, after two extensions of time.
3. Counsel has substantial need for an additional 30-day extension, until February 7, 2022, in order to complete and file the Appellee's response brief in this case, due to counsel's other assignments and workload. Since the last extension of

time in this case, counsel was out of the office during the holidays and has filed or been assigned the following cases:

*In re M.D. (YINC)*, DA 21-0366, Appellee's Brief filed December 23, 2021;

*State v. Soria*, DA 20-0497, Appellee's Brief due January 12, 2022;

*Reinert v. State*, 21-CV-74 (U.S. Dist. Ct.), Federal Habeas Answer due January 24, 2022; and

*State v. Mefford*, DA 20-0330, Appellee's Brief due February 28, 2022.

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

5. I have worked, and will continue to work, diligently to complete this matter in the time requested.

6. 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 3rd day of January, 2022.

/s/ Jonathan M. Krauss  
JONATHAN M. KRAUSS

## **CERTIFICATE OF SERVICE**

I, Jonathan Mark Krauss, hereby certify that I have served true and accurate copies of the foregoing Motion - Unopposed to the following on 01-03-2022:

Travis R. Ahner (Govt Attorney)  
820 South Main Street  
Kalispell MT 59901  
Representing: State of Montana  
Service Method: eService

Deborah Susan Smith (Attorney)  
555 Fuller Avenue  
P.O. Box 200147  
Helena MT 59620-0147  
Representing: Ronald Alan Hummel  
Service Method: eService

Electronically signed by Dia Lang on behalf of Jonathan Mark Krauss  
Dated: 01-03-2022