

AUSTIN KNUDSEN
Montana Attorney General
JONATHAN KRAUSS
Assistant Attorney General
215 North Sanders
P.O. Box 201401
Helena, MT 59620-1401
Phone: 406-444-2026
Fax: 406-444-3549
jkrauss@mt.gov

COUNSEL FOR PLAINTIFF AND APPELLEE

IN THE SUPREME COURT OF THE STATE OF MONTANA

No. DA 20-0497

STATE OF MONTANA,

Plaintiff and Appellee,

v.

RICHARD JAMES SORIA,

Defendant and Appellant.

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

The Appellee, State of Montana, respectfully requests a 30-day extension of time until March 14, 2022, in which to 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 February, 2022.

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

By: /s/ Jonathan M. Krauss
JONATHAN M. 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 December 13, 2021. The brief is presently due on February 11, 2022, after two extensions of time.
3. Counsel has substantial need for an additional 30-day extension, until March 14, 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 has filed or been assigned the following cases:

In re S.S. (YINC), DA 21-0414, Appellee's Brief filed February 3, 2022;

Reinert v. State, 21-CV-74 (U.S. Dist. Ct.), Federal Habeas Answer due February 23, 2022;

In re S.E. (involuntary commitment), DA 20-0511, Appellee's Brief due February 25, 2022;

State v. Mefford, DA 20-0330, Appellee's Brief due February 28, 2022, and Oral Argument scheduled for April 8, 2022; and

State v. Hummel, DA 20-0064, Appellee's Brief due March 9, 2022.

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

5. 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.

Dated this 3rd day of February, 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 02-03-2022:

Chad M. Wright (Attorney)
P.O. Box 200147
Helena MT 59620-0147
Representing: Richard James Soria
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

Peter Allan Wood (Attorney)
1604 N 30th St
Boise ID 83703
Representing: Richard James Soria
Service Method: eService

Electronically signed by Dia Lang on behalf of Jonathan Mark Krauss
Dated: 02-03-2022