FILED

05/12/2022

Bowen Greenwood CLERK OF THE SUPREME COURT STATE OF MONTANA

Case Number: DA 21-0059

Jack H. Morris Morris Law Firm 211 Chestnut St., Ste A Missoula, MT 59801 Telephone: (406) 461-6240 Email: Jackhmorris61@gmail.com Attorneys for Defendant-Appellant Thomas Richard Ferris

#### IN THE SUPREME COURT OF THE STATE OF MONTANA

No. DA-21-0059

) )

)

)

STATE OF MONTANA,
Plaintiff and Appellee,
V.
THOMAS RICHARD FERRIS
Defendant and Appellant.

# MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF

COMES NOW the above-named Defendant and Appellant and Thomas Richard Ferris and moves the Court pursuant to Rule 26(1), M.R.App.P., for an extension of time in which to file and serve his reply brief in this matter. The Appellant, respectfully requests a 30-day extension of time until June 30, 2022, in which to prepare, serve, and file his reply brief in the above-entitled matter. The brief is presently due on May 13, 2022, and this is the Appellant's first extension request on his reply brief. This motion is made due to the heavy workload under which the Appellant's attorney to this case is presently working where he is preparing for a jury trial in Lewis and Clark District Court, making it impossible to properly research, consider, and draft his reply brief.

The Appellee's counsel, Katie F. Schulz, has been contacted regarding this motion for extension of time and does not oppose the requested extension.

DATED this \_\_12\_\_ day of May, 2022.

## MORRIS LAW FIRM

By: \_/s/ Jack H. Morris

## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing MOTION FOR EXTENSION OF

## TIME TO FILE REPLY BRIEF was served on all parties of record by

email and also by depositing a true and correct copy in the US Mail, postage

pre-paid on the \_\_12\_\_ day of May, 2022 addressed as follows:

Austin Knutson Montana Attorney General Katie Schulz Deputy Attorney General 215 N. Sanders P.O. Box 201401 Helena, MT 59620-1401

Jed Fitch Beaverhead County Attorney 2. South Pacific St. Dillon, MT 59725

By\_/s/ Jack H. Morris

### **CERTIFICATE OF SERVICE**

I, Jack H. Morris, hereby certify that I have served true and accurate copies of the foregoing Motion - Unopposed to the following on 05-12-2022:

Jed C. Fitch (Govt Attorney) 2 S. Pacific Street - CL2 Dillon MT 59725 Representing: State of Montana Service Method: eService

Kathryn Fey Schulz (Govt Attorney) 215 North Sanders P.O. Box 201401 Helena MT 59620-1401 Representing: State of Montana Service Method: eService

> Electronically Signed By: Jack H. Morris Dated: 05-12-2022