

Stephanie M. Breck
Justin G. Breck
BRECK LAW OFFICE, PC
813 Fourth Avenue West
Post Office Box 2071
Columbia Falls, MT 59912

Attorneys for Appellant

IN THE SUPREME COURT OF THE STATE OF MONTANA

| | |
|---|--|
| <p>MICHAEL A. SANTACROCE,</p> <p>Plaintiff/Appellee</p> <p>vs.</p> <p>KENNITH G. FERRON,</p> <p>Defendant/Appellant</p> | <p>Cause No. DA-22-0063</p> <p><u>APPELLANT'S SECOND</u> <u>UNOPPOSED MOTION TO</u> <u>EXTEND OPENING BRIEF</u> <u>DEADLINE</u></p> |
|---|--|

COMES NOW, Appellant Kenneth Ferron by and through legal counsel, Stephanie M. Breck, and hereby requests that this Court extend the deadline for Appellant's opening brief from Friday, June 3, 2022 to **Friday, July 1, 2022**. Appellant's counsel has engaged in conversation with Appellee's counsel on the grounds for this motion and Appellee does not oppose this motion.

Good cause exists for this extension due to further unanticipated scheduling issues and the very recent development of some health concerns on behalf of Appellant's counsel. Appellee's counsel has also just experienced a health setback

and agrees that this extension will allow both parties to put forth their best efforts in this matter. Both parties appreciate the Court's extension of this deadline.

DATED this 31st day of May, 2022.

BRECK LAW OFFICE, PC

By: /s/Stephanie M. Breck
Attorneys for Appellant

CERTIFICATE OF SERVICE

I, Stephanie M. Breck, of Breck Law Office, PC, hereby certify that I have served true and accurate copies of the foregoing Appellant's Second Unopposed Motion to Extend Opening Brief Deadline upon the Clerk of the District Court and each attorney of record in the District Court action, as follows:

Ms. Peg Allison
Clerk of Court
Flathead County Justice Center
920 South Main, Suite 300
Kalispell, MT 59901

Richard De Jana & Associates, PLLC
Richard De Jana
P.O. Box 1757
Kalispell, MT 59903
rdj.dejanalaw@gmail.com
rdejana@montanasky.net

DATED this 31st day of May, 2022.

/s/Stephanie M. Breck
STEPHANIE M. BRECK

CERTIFICATE OF SERVICE

I, Stephanie M. Breck, hereby certify that I have served true and accurate copies of the foregoing Motion - Unopposed to the following on 06-01-2022:

Justin Glenn Breck (Attorney)
Post Office Box 2071
Columbia Falls MT 59912
Representing: Kenneth G Ferron
Service Method: eService

Richard P. DeJana (Attorney)
120 4th Street West
P.O. Box 1757
Kalispell MT 59903
Representing: Michael A Santacroce
Service Method: eService

Peg L Allison (Clerk of District Court)
920 S Main, Ste 300
Kalispell MT 59901
Service Method: eService
E-mail Address: pallison@flathead.mt.gov

Electronically signed by Marcy Marie Hall on behalf of Stephanie M. Breck
Dated: 06-01-2022