

PENELOPE S. STRONG
Attorney at Law
2501 Montana Avenue – Ste. 4
Billings, Montana 59101
Tel: (406) 839-9220
Fax: (406) 839-9221
ps18rabbits@gmail.com

Attorney for Petitioner and Appellee

IN THE SUPREME COURT OF THE STATE OF MONTANA

DA 22-0133

MEGAN SAYLER,)
)
Petitioner and Appellee,)
)
and)
)
YAN SUN,)
)
Respondent and Appellant.)

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
RESPONSE TO OPENING BRIEF**

COMES NOW, Petitioner and Appellee, MEGAN SAYLER, by and through
her counsel of record, Penelope S. Strong, pursuant Mont. R. App. Pro. 26 (1), and

respectfully moves the Court for an Extension of Time to File Response to Appellant's 2nd Opening Brief filed June 2, 2022, from July 5, 2022, to August 5, 2022.

The basis for this motion is:

1. Counsel is a sole practitioner, and carries a full time case load.
2. Her partner recently had major surgery out of state, and she must take time off to assist in his recuperation.
3. He is not fully ambulatory, uses oxygen 24/7, and needs daily assistance.

Opposing counsel was contacted and has no objection to the motion.

DATED this 29th day of June, 2022.

/s/ Penelope S. Strong
Penelope S. Strong
Attorney for Petitioner and Appellee

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that a true and correct copy of the foregoing was served, by eService upon the following interested parties on this 29th day of June, 2022:

Terry Halpin
Clerk of District Court
Thirteenth Judicial District
P.O. Box 35030
Billings, MT 59107

Melinda A. Driscoll
Fred Law Firm, PLLC
214 N. 24th St.
P.O. Box 2157
Billings, MT 59103

Morgan E. Dake
Crowley Fleck PLLP
P.O. Box 2529
Billings, MT 59103-2529

/s/ Julie K. Palmersheim
Julie K. Palmersheim

CERTIFICATE OF SERVICE

I, Penelope S. Strong, hereby certify that I have served true and accurate copies of the foregoing Motion - Extension of Time to the following on 06-29-2022:

Melinda Ann Driscoll (Attorney)
P.O. Box 2157
Billings MT 59103
Representing: Sun Yan
Service Method: eService

Morgan E. Dake (Attorney)
490 N. 31st Street
Suite 500 TW2
Suite 500 TW2
Billings MT 59101
Representing: Sun Yan
Service Method: eService

Electronically Signed By: Penelope S. Strong
Dated: 06-29-2022