

IN THE SUPREME COURT OF THE STATE OF MONTANA

No. DA 22-041

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STATE OF MONTANA,

Plaintiff and Appellee,

v.

JAMES MICHAEL PARKER,

Defendant and Appellant.

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**MOTION FOR EXTENSION OF TIME**

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Caitlin Boland Aarab, appointed counsel for Appellant James Michael Parker, respectfully requests an extension of time until November 27, 2022, in which to prepare, file, and serve the Appellant's opening brief in the above-captioned matter. This is Appellant's first request for an extension, as well as counsel's first request. Appellant's opening brief is presently due October 28, 2022. Opposing counsel has been contacted concerning this motion and has consented to the extension. Appellant submits the attached affidavit in support of this motion.

Respectfully submitted this 14th day of October, 2022.

By: /s/ Caitlin Boland Aarab  
Caitlin Boland Aarab  
BOLAND AARAB PLLP

STATE OF MONTANA        )  
  : ss.  
County of Cascade        )

I, Caitlin Boland Aarab, pursuant to Mont. Code Ann. §§ 1-1-203, 1-6-105, declare:

1. I am a licensed, practicing attorney in the State of Montana, and I am a partner in the law firm Boland Aarab PLLP.
2. I am a contract attorney with the Office of the Appellate Defender (OAD). On October 12, 2022, I was appointed by the OAD to represent the Appellant in this matter.
3. The Appellant’s opening brief is currently due on October 28, 2022.
4. Counsel requires additional time to complete the opening brief because she was just appointed on October 12, 2022 and the record consists of transcripts for 18 pretrial hearings, an 8-day jury trial, and

425 docket entries, therefore Counsel requires more time to review the record and identify preserved issues for appeal.

5. Opposing counsel has been contacted concerning this motion and has consented to the extension.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Caitlin Boland Aarab  
Caitlin Boland Aarab, Great Falls, MT

October 14, 2022  
Date

## CERTIFICATE OF SERVICE

I, Caitlin Boland Aarab, hereby certify that I have served true and accurate copies of the foregoing Motion - Unopposed to the following on 10-14-2022:

Chad M. Wright (Attorney)  
P.O. Box 200147  
Helena MT 59620-0147  
Representing: James Michael Parker  
Service Method: eService

Austin Miles Knudsen (Govt Attorney)  
215 N. Sanders  
Helena MT 59620  
Representing: State of Montana  
Service Method: eService

Joshua A. Racki (Govt Attorney)  
121 4th Street North  
Suite 2A  
Great Falls MT 59401  
Representing: State of Montana  
Service Method: eService

Electronically Signed By: Caitlin Boland Aarab  
Dated: 10-14-2022