

IN THE SUPREME COURT OF THE STATE OF MONTANA

No. DA 21-0647

STATE OF MONTANA,

Plaintiff and Appellee,

v.

DERRELL RUSSELL DOWD,

Defendant and Appellant.

**UNOPPOSED MOTION FOR EXTENSION OF TIME
WITH AFFIDAVIT IN SUPPORT**

COMES NOW, Haley Connell Jackson, Assistant Appellate Defender for the Appellate Defender Division, and respectfully requests an extension of time until December 28, 2022, in which to prepare, file, and serve the Appellant's opening brief in the above-entitled matter.

This is Appellant's eleventh request for an extension. Appellant's opening brief was initially due January 28, 2022. Appellant's opening brief is currently due November 28, 2022. Appellant submits the attached affidavit in support of this motion.

Opposing counsel has been contacted and has no objection.

Respectfully submitted this 18th day of November, 2022.

OFFICE OF STATE PUBLIC DEFENDER
APPELLATE DEFENDER DIVISION
P.O. Box 200147
Helena, MT 59620-0147

By: /s/ Haley Connell Jackson
HALEY CONNELL JACKSON
Assistant Appellate Defender

5. Opposing counsel has been contacted and does not object to this request.

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

/s/ Haley Connell Jackson
Haley Connell Jackson
Bozeman, Montana

November 18, 2022
Date

CERTIFICATE OF SERVICE

I, Haley Connell Jackson, hereby certify that I have served true and accurate copies of the foregoing Motion - Unopposed to the following on 11-18-2022:

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

Marcia Jean Boris (Attorney)
Lincoln County Attorney
512 California Avenue
Libby MT 59923
Representing: State of Montana
Service Method: E-mail Delivery

Electronically signed by Pamela S. Rossi on behalf of Haley Connell Jackson
Dated: 11-18-2022