Bowen Greenwood
CLERK OF THE SUPREME COURT
STATE OF MONTANA

Case Number: DA 23-0253

IN THE SUPREME COURT OF THE STATE OF MONTANA Supreme Court Cause No. DA 23-0253

JOSHUA T. PATTERSON a/k/a JOSH PATTERSON, as an individual and d/b/a PATTERSON ENTERPRISES, INC., also d/b/a ROCKY MOUNTAIN EQUIPMENT, INC., p/k/a ROCKY MOUNTAIN JCB, INC., also d/b/a ROCKY MOUNTAIN RENTAL SPECIALISTS, LLC, also d/b/a ROCKY MOUNTAIN EQUIPMENT also d/b/a ROCKY MOUNTAIN RENTAL, also d/b/a ROCKY MOUNTAIN RENTAL, also d/b/a ROCKY MOUNTAIN EQUIPMENT OF MISSOULA MONTANA,

Defendants/Appellants,

VS.

ADAM PUMMILL, an individual, and ADAM PUMMILL and KURTIS ROBERTSON as a member of Black Gold Enterprises, LLC, members of, and on behalf of BLACK GOLD ENTERPRISES, LLC,

Plaintiffs/Appellees.

APPELLANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME

On Appeal from the Fourth Judicial District Court, Missoula County Cause No. DV-18-1450 The Honorable John W. Larson, Presiding

Shane A. MacIntyre
Robert L. Sterup
BROWN LAW FIRM, P.C.
269 W. Front Street, Suite A
Missoula, MT 59802
Tel (406) 830-3248
Fax (406) 830-3745
smacintyre@brownfirm.com
rsterup@brownfirm.com
Attorneys for Defendants/Appellants

James P. O'Brien O'BRIEN LAW OFFICE, P.C. 212 West Spruce Street Missoula, MT 59807-7936 Tel (406) 721-0660 Fax (406) 721-0664 info@obrienlegalservices.com Attorney for Plaintiffs/Appellees

Don C. St. Peter Michael O'Brien Logan Nutzman ST. PETER LAW OFFICES, P.C. 2620 Radio Way Missoula, MT 59808 Tel (406) 728-8282 Fax (406) 728-8141 Attorneys for Receiver Jim Galipeau

Pursuant to Montana Rule of Appellate Procedure 16, Appellants respectfully move this Court for an extension of time to file their response brief in opposition to Receiver's Motion to Dismiss filed on May 22, 2023. Appellants request an extension of time up to and including Friday, June 9, 2023 to file their response brief.

Counsel for all parties, as well as counsel for Receiver, have been contacted and do not oppose this motion.

DATED this 1st day of June, 2023.

BROWN LAW FIRM, P.C.

/s/ Shane A. MacIntyre
Shane A. MacIntyre
Robert L. Sterup
Attorneys for Defendants/Appellants

CERTIFICATE OF SERVICE

I, Shane Alexander MacIntyre, hereby certify that I have served true and accurate copies of the foregoing Motion - Unopposed to the following on 06-01-2023:

Donald Craig St. Peter (Attorney) 2620 Radio Way P.O. Box 17255 Missoula MT 59808 Representing: Jim Galipeau Service Method: eService

Logan Alan Nutzman (Attorney) 2620 Radio Way Missoula MT 59808 Representing: Jim Galipeau Service Method: eService

Michael Hawkins O'Brien (Attorney) 2620 Radio Way P.O. Box 17255 Missoula MT 59808 Representing: Jim Galipeau Service Method: eService

Robert L. Sterup (Attorney) 315 North 24th Street

Billings MT 59101

Representing: Patterson Enterprises, Inc., Joshua T. Patterson

Service Method: eService

Dustin M. Chouinard (Attorney) 601 South First Street Hamilton MT 59840 Representing: PF4 Construction Group, LLC Service Method: eService

James P. O'Brien (Attorney) P.O. Box 7936 Missoula MT 59807 Representing: Adam Pummill, Kurtis Robertson Service Method: eService

Electronically Signed By: Shane Alexander MacIntyre Dated: 06-01-2023