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Attorneys for Defendant Chicago Title Insurance Company

**IN THE SUPREME COURT OF THE STATE OF MONTANA**  
**Supreme Court Cause No. DA 23-0033**

SHARON MCCREA,

Appellant/Plaintiff,

-VS-

CONNIE SUE LARSON, THE ESTATE  
OF MARTIN C. CHEW, CHICAGO  
TITLE INSURANCE COMPANY,  
LOANCARE ACCOUNT SERVICING,  
AND ANY OTHER PARTIES, i.e. JOHN  
DOE,

Appellees/Defendants.

**MOTION FOR FIRST  
EXTENSION OF TIME TO  
FILE RESPONSE BRIEF**

Appellees Chicago Title Insurance Company (“CTIC”) and LoanCare Account Servicing (“LoanCare”), by and through their undersigned counsel, hereby move this Court, pursuant to Mont.R.App.P. 16 and 26(1), for a 30-day extension up to and including October 1, 2023, within which to file their Response Brief (“Brief”). This is CTIC’s and LoanCare’s first request for an extension, and they are entitled

to the automatic 30-day extension provided in Rule 26(1): “In all cases except those addressed in section (2) of this rule, a party may move for and be granted one 30-day extension of time in which to file a brief required or allowed to be filed under these rules.”

CTIC’s and LoanCare’s response brief is currently due on September 1, 2023. CTIC and LoanCare respectfully request a 30-day extension, which would make their response brief due October 1, 2023.

The undersigned counsel has not contacted the Appellant as to whether she objects to this motion; appellant has refused to provide current contact information in order for that contact to be made. No previous request for extension has been filed regarding CTIC’s and LoanCare’s response Brief.

DATED this 30th day of August, 2023.

MOULTON BELLINGHAM PC

By /s/Christopher T. Sweeney  
Christopher T. Sweeney

Attorneys for Defendant Chicago  
Title Insurance Company and  
LoanCare Account Servicing

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was duly served upon the following via U.S. mail on this 30th day of August, 2023.

William J. Levine  
Marra, Evenson & Levine, PC  
2 Railroad Square, Suite C  
P O Box 1525  
Great Falls, MT 59403-1525

Sharon McCrea  
P O Box 405  
Black Eagle, MT 59414  
*Pro Se Appellant/Plaintiff*

/s/Christopher T. Sweeney

## **CERTIFICATE OF COMPLIANCE**

Pursuant to Mont. R. App. P.11, I certify that this brief is printed with a proportionately spaced Times New Roman text typeface of 14 points; is double-spaced, with left, right, top, and bottom margins of one inch; and that the word count calculated by Microsoft Word is 213 words, excluding the Certificate of Compliance, and Certificate of Service.

/s/Christopher T. Sweeney

## **CERTIFICATE OF SERVICE**

I, Christopher Thayne Sweeney, hereby certify that I have served true and accurate copies of the foregoing Motion - Extension of Time to the following on 08-30-2023:

William Joseph Levine (Attorney)

P.O. Box 1525

Great Falls MT 59403

Representing: Connie Sue Larson, The Estate of Martinne C. Chew, Chicago Title Insurance Company, LoanCare Account Servicing

Service Method: eService

Sharon McCrea (Appellant)

P.O. Box 405

Black Eagle MT 59414

Service Method: Conventional

Electronically signed by Carrie Nance on behalf of Christopher Thayne Sweeney  
Dated: 08-30-2023