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IN THE SUPREME COURT OF THE STATE OF MONTANA

No. OP 23-0423 and OP 23-0424

SILAS J. CORPRON,

Petitioner,

v.

JAMES SALMONSEN,
Warden,

Respondent.

**ATTORNEY GENERAL'S RESPONSE TO PETITIONS
FOR WRIT OF HABEAS CORPUS**

In response to the two Petitions for Writ of Habeas Corpus filed by Silas J. Corpron (Corpron), the Attorney General's Office submits this consolidated response. Corpron petitions for relief from Fifth Judicial District Court Cause No. DC-18-060 and First Judicial District Court Cause No. CDC-19-326. As part of its

response, the State submits, and incorporates by reference, relevant documents from Cause Nos. DC-18-060 and CDC-19-326.¹

RELEVANT PROCEDURAL HISTORY

I. Cause No. DC-18-60

On October 28, 2018, Corpron was arrested in Jefferson County after entering a residence and assaulting individuals inside. (Exs. 1-2.) Bond was set at \$50,000 and an Information was filed alleging seven charges against Corpron. (Exs. 1-3.) Following plea negotiations, Corpron pled guilty to one count of criminal endangerment on April 17, 2019, and was released on his own recognizance (OR'd) pending sentencing. (Ex. 4.) On October 30, 2019, the district court sentenced Corpron to the Department of Corrections (DOC) for a term of five years, with two of those years suspended. (Exs. 5-6.) Corpron received 171 days of credit for time served (10/28/18 to 4/17/19). (*Id.*)

After applying his 171 days of credit to his custodial 3-year sentence, Corpron discharged his 2-year probationary sentence on May 11, 2022. (Ex. 7.) Corpron violated the conditions of his suspended sentence and was arrested by his probation officer (PO) on February 10, 2023. (*Id.*) A petition to revoke was filed

¹The State requests that this Court take judicial notice of the documents attached to the State's response pursuant to Mont. R. Evid. 202(b)(6), 201(b)(2), and 201(d).

and he was served with the bench warrant on February 28, 2023, at the Lewis and County Detention Center (LCDC). (Ex. 8.)

On March 31, 2023, Corpron admitted he had violated his suspended sentence, and on April 12, 2023, the court conducted a dispositional hearing. (Exs. 9-11.) The court committed Corpron to the DOC for a period of 2 years. (*Id.*) The court gave Corpron elapsed time credit of 152 days based on the probation officer's recommendation. (*Id.*; Ex. 7.) Corpron also received 43 days of jail credit (2/28/23 to 4/12/23), for a total of 195 days of credit. (*Id.*)

II. Cause No. CDC-19-326

Corpron was arrested in Lewis and Clark County on June 25, 2019, for stalking and violating an order of protection (VOP). (Exs. 12-13.) Corpron was ultimately charged with felony stalking and three VOP offenses (two misdemeanors, one felony). (Ex. 14.) Corpron remained incarcerated in LCDC until he posted bond on August 14, 2019. (Ex. 15.) Corpron failed to contact pretrial services as directed, so the court issued a bench warrant, which was served on Corpron on September 30, 2019. (Exs. 16, 17.)

After Corpron filed a notice of intent to rely on mental disease or defect, the State filed a motion to commit Corpron to the Montana State Hospital (MSH) for a fitness evaluation, which was granted by the district court on November 25, 2019.

(Exs. 18-20.) Corpron was admitted to MSH on May 13, 2020, and his commitment was extended once. (Exs. 12, 21-23.) Corpron's evaluation was completed on July 23, 2020, and he was found fit to proceed. (Ex. 23.)

Pursuant to a plea agreement, Corpron pled guilty to the 3 VOP offenses and the stalking offense was dismissed. (Exs. 24, 26.) At his December 3, 2020 sentencing hearing, Corpron was sentenced as follows: Count I, 6 months in jail, all suspended; Count II, 6 months in jail with all but 24 hours suspended; and Count III, 2 year commitment to the DOC with all but 10 days suspended. (Exs. 25-26.) The court ordered these three counts to run consecutively to each other, but concurrently to the 2-year suspended portion of his Jefferson County sentence. (*Id.*) The court granted Corpron credit for a total of 81 days (50 days (6/25/19 to 8/14/19); and 31 days (9/30/19 to 10/31/19)). (*Id.*)

Corpron began serving his Lewis and Clark County sentence on May 11, 2022, when he discharged his three-year DOC term in DC-18-060 and began serving the two-year suspended portion of that sentence. (Ex. 26-27.) Soon after, Corpron violated the conditions of his probation, and his PO arrested him on February 10, 2023. (*Id.*) The State petitioned to revoke Corpron's sentence, and he was served with the bench warrant on February 23, 2023. (Exs. 27-28.)

At the March 30, 2023 revocation hearing, Corpron admitted to "some or all" of the alleged probation violations and the court revoked all three sentences.

(Ex. 29.)² At his April 27, 2023 dispositional hearing, Corpron was sentenced to jail for six months for Counts I and II, and for Count III Corpron was committed to the DOC for two years. (*Id.*) Although these three counts were originally ordered to run consecutively to each other, at disposition, the court ordered them to run concurrently to one another. (*Id.*) The district court awarded 152 days of elapsed time credit based on the PO's report. (*Id.*) The district court further ordered that Corpron was entitled to 70 days for "pre-sentence incarceration in 2020," and another 75 days credit from February 10, 2023 to April 26, 2023. (*Id.*)

STANDARD OF REVIEW

Montana Code Annotated § 46-22-101(1) allows a person who is incarcerated or restrained of liberty to apply for a "writ of habeas corpus to inquire into the cause of imprisonment or restraint and, if illegal, to be delivered from the imprisonment or restraint." The fundamental purpose of habeas corpus is to remedy "illegal" restraints or imprisonments (*e.g.*, a sentence that exceeds statutory or constitutional limits). *Lott v. State*, 2006 MT 279, 334 Mont. 270, 150 P.3d 337.

²In its petition to revoke, the State listed all three counts; however, it appears that Corpron would have discharged Count I by August 22, 2022, if the 81 days of credit had been applied to that count. That would make Count II's discharge date February 23, 2023. However, since the district court ultimately ordered the revoked sentences to run concurrently to one another, Corpron was not prejudiced.

This Court reviews a criminal sentence for legality *de novo* to determine whether the sentence is within statutory parameters. *State v. Seals*, 2007 MT 71, ¶ 7, 336 Mont. 416, 156 P.3d 15. Confinement beyond the expiration of a sentence is an unlawful imprisonment or restraint, and habeas corpus actions are a proper means of challenging the proper crediting for time served. *Johnston v. Kirkegard*, No. OP 12-0741, 369 Mont. 540, 310 P.3d 1098, 2013 Mont. LEXIS 74, *6-7 (Feb. 5, 2013).

Corpron bears the burden of demonstrating sufficient legal cause to persuade the Court to grant the writ of habeas corpus. *Miller v. Dist. Court*, 2007 MT 58, ¶ 14, 336 Mont. 207, 154 P.3d 1186.

PETITIONER’S ALLEGATIONS

Corpron filed two habeas petitions with this Court on August 4, 2023, wherein he asserts he should have received credit for the following periods of time: October 28, 2018 to April 17, 2019 (171 days); June 25, 2019 to August 14, 2019 (50 days); and September 30, 2019 to February 12, 2021. (Pets. at 1.) Citing only to § 46-18-201(9), MCA, and *Killam v. Salmonsens*, 2021 MT 196, 405 Mont. 143, 492 P.3d 512, Corpron alleges that he “should have received credit for time served for each case without considering how much credit was given on any other case and/or Cause No.” (*Id.*) Corpron did not specify whether he is challenging his

original judgments and sentences entered in 2019 and 2020 or his orders of revocation and disposition entered in April 2023.

STATE’S RESPONSE

I. Original judgments and sentences

A. Corpron’s October 30, 2019, and December 3, 2020, judgments and sentences should not be considered.

Corpron did not appeal either of his original judgments and sentences. It is well-established that this Court is “‘without jurisdiction to review the legality’ of [an appellant’s] original sentence in a revocation proceeding, where [an appellant] had not challenged his original sentence by appeal.” *State v. Torres*, 2017 MT 177, ¶ 10, 388 Mont. 161, 398 P.3d 279 (citing *State v. Muhammad*, 2002 MT 47, ¶ 22, 309 Mont. 1, 43 P.3d 318); *United States v. Warren*, 335 F.3d 76, 77 (2d Cir. 2003) (revocation proceeding no “proper forum for a collateral attack on the [original] conviction or sentence”).

The same should hold true for state habeas proceedings. If this Court has no jurisdiction to reach back and review an original judgment and sentence in a direct appeal from a revocation proceeding, it stands to reason it cannot reach back to recalculate credit for time served awarded in a petitioner’s original judgment and sentence when he files a petition for state habeas after that sentence has been revoked.

However, even if this Court is willing to reach back to Corpron's original judgments and sentences, he has not established that either was facially invalid because he received the correct amount of credit under the laws in effect at the time.

B. Corpron received the correct amount of credit in his original judgments and sentences.

When a term of incarceration is imposed following a conviction, § 46-18-201(9), MCA (herein after, § 201(9)) and § 46-18-403(1), MCA (hereinafter, § 403(1)) outline what credit a defendant is owed for time spent incarcerated prior to that initial/original sentence. Pursuant to § 403(1), "[a] person incarcerated on a bailable offense . . . must be allowed credit for each day of incarceration prior to or after conviction." Pursuant to § 201(9), "[w]hen imposing a sentence under this section that includes incarceration in a detention facility or the state prison, . . . the court shall provide credit for time served by the offender before trial or sentencing." This provision applies to offenses committed after June 30, 2017. *See* 2017 Mont. Laws, ch. 321 §§ 24, 44 (bill enacting § 201(9), HB 133); *State v. Thomas*, 2019 MT 155, ¶¶ 3, 9, 14, 396 Mont. 284, 445 P.3d 777; *Linwood v. Salmonsens*, 405 Mont. 537, 495 P.3d 421 (2021) (tables).

Prior to August 2021, this Court's jurisprudence affirmed sentencing orders that did not grant credit if an offender had been sentenced to a custodial sentence in a different matter, relying upon § 403(1). *See, e.g., State v. Kime*, 2002 MT 38,

¶ 16, 308 Mont. 341, 43 P.3d 290 (affirming order giving credit on new case only for days from arrest to date of transfer to Montana State Prison to serve revoked sentence because Kime was no longer being held on a “bailable offense” even though bond was set and never posted on the offense for which he was sentenced); *State v. Pavey*, 2010 MT 104, ¶¶ 21, 22, 25, 356 Mont. 248, 231 P.3d 1104 (affirming order denying credit for time served where subsequent to revocation on a prior offense defendant was charged with new bailable offenses after he was revoked and placed at Montana State Prison to serve his revoked sentence).

In August 2021, this Court held that § 201(9) directs sentencing courts to determine the applicable credit due solely “based on the record relating to the offense for which the defendant is being sentenced on without considering other criminal proceedings or DOC incarceration holds.” *Killam*, ¶¶ 12, 17 (held, court erred by not granting credit “for each day of incarceration from the date of arrest through the date of the court’s imposition of sentence.”); *State v. Mendoza*, 2021 MT 197, ¶ 9, 405 Mont. 154, 492 P.3d 509 (same).

1. Jefferson County case

Prior to his October 30, 2019 sentencing hearing, the only dates Corpron was incarcerated relative to his Jefferson County case were between his arrest (10/28/18) and the date he was OR’d (4/17/19). Corpron correctly received credit for those 171 days in his October 30, 2019 judgment and sentence. Notably, these

171 days were applied to his 3-year DOC custodial sentence, making May 11, 2022, the date he discharged the 2-year suspended portion of this sentence.

Corpron was not entitled to credit for his time at LCDC from June 25, 2019 to August 14, 2019, in his Jefferson County case because he was incarcerated during that time period pursuant to a warrant in CDC-19-326, not DC-18-060. At the time he committed the Lewis and Clark County offense, he was out OR in DC-18-060 and was not held on a warrant in that case.

Similarly, Corpron is not entitled to credit in his Jefferson County case beginning on September 30, 2019, as he alleges in his petition. On that date, Corpron was arrested on a warrant in the Lewis and Clark County case for violating his bail conditions in CDC-19-326, not DC-18-060. The fact that he was in custody on an entirely different case when he was sentenced on October 30, 2019, in DC-18-060 does not mean he is entitled to credit between September 30, 2019 and October 30, 2019, because he was held on a warrant from his Lewis and Clark County case.

From October 31, 2019 to February 12, 2021, Corpron received credit against his 3-year custodial sentence in DC-18-060 because it began to run on that date. Applying the 171 days of correct credit to that custodial sentence gave Corpron a discharge date of May 11, 2022, at which time he began to serve his 2-year suspended sentence in DC-18-060.

The district court awarded Corpron the correct amount of credit in his October 30, 2019 judgment and sentence. Corpron has not met his burden to establish that sentence was facially invalid. *Lott, supra*; *Miller*, ¶ 14; *Seals*, ¶ 7.

2. Lewis and Clark County case

Corpron was not entitled to receive credit for 171 days (10/28/18 to 4/17/19) in his Lewis and Clark County case. Corpron did not commit the Lewis and Clark County offense until June 25, 2019 (two months after April 17, 2019), so he certainly was not detained in CDC-19-326 during that time period.

Corpron was entitled to, and was awarded, credit for 50 days served from June 25, 2019 (arrest date) to August 14, 2019 (date posted bond). In addition to those 50 days, Corpron was properly awarded credit for 31 days from September 30, 2019 to October 31, 2019.

The September 30, 2019 start date is correct, as that is when he was served with the arrest warrant for violating his conditions of release. The October 31, 2019 end date was also correct under this Court's jurisprudence at the time. *Killam* and *Mendoza* were not decided until August 2021. Under the law in effect in December 2020, the district court did not err when it stopped running Corpron's credit on the date that he became a DOC inmate under his sentence in Jefferson County. *See Kime, supra*; *Pavey, supra*.

The district court awarded Corpron the correct amount of credit in his December 3, 2020 judgment and sentence under the laws in effect at the time. Corpron has not met his burden under *Miller* to establish that sentence was facially invalid. *Lott, supra*; *Miller*, ¶ 14; *Seals*, ¶ 7.

II. Corpron's orders of revocation

When imposing disposition following revocation of a probationary sentence, § 46-18-203(7)(b), MCA (hereinafter, § 203(7)(b)), addresses what credit a probationer is owed for time spent on probation (*i.e.*, elapsed time) and time spent incarcerated pending disposition (*i.e.*, “time served in a detention center or for home arrested time already served”).

A. Jefferson County case

Following revocation of his suspended sentence, the court awarded Corpron a total of 195 days of credit, broken out as follows: 152 days of elapsed time credit and 43 days (date served with warrant (2/28/23) to date of disposition (4/12/23)) of time incarcerated.

Corpron would not be entitled to the 171 days of credit again since it had already been applied to his 3-year custodial sentence. However, it does appear Corpron should receive an additional 18 days of credit for actual time in jail. The record shows Corpron was arrested by his PO on February 10, 2023. Therefore,

Corpron's dispositional order following revocation should grant him credit for 61 days (2/10/23 to 4/12/23) and 152 days of elapsed time credit for a total of 213 days. *See* § 46-18-203(7)(b), MCA.

B. Lewis and Clark County case

Following Corpron's revocation, the district court awarded 152 days of elapsed time credit and 145 days of credit for incarceration (70 days for "2020 pre-sentence incarceration" and 75 days for pre-revocation incarceration).

The 75 days of pre-revocation was correct: date arrested by PO (2/10/23) to date of disposition (4/27/23). *See* § 203(7)(b). The 70 days of "2020 pre-sentence" credit was likely determined by subtracting the 11 days of un-suspended time imposed in Count II (24 days) and Count III (10 days) from the 81 days of presentence incarceration granted in his original judgment and sentence. The court properly carried these 70 days of credit forward to his revocation disposition because it qualified as "time served in a detention center or for home arrest time already served." § 203(7)(b), MCA.

In his Petitions, Corpron listed three periods of credit he believes he was entitled to receive. As demonstrated above, Corpron was not entitled to the 171 days awarded in his Jefferson County case in his Lewis and Clark County case. As for the second period Corpron listed (6/25/19 to 8/14/19), the court credited those 50 days as part of the 70 days of "2020 pre-sentence incarceration."

That leaves the third period of credit Corpron claims he should have received credit, September 30, 2019 to February 12, 2021. As established above, Corpron received credit for 31 days from September 30, 2019, until October 31, 2019. Corpron's request for credit from December 3, 2020 to February 12, 2021, is unsupported because Corpron stopped earning credit in CDC-19-326 on December 3, 2020, when the court imposed a suspended sentence (but he continued to receive custodial credit against his Jefferson County sentence).

Thus, the period of time that may remain at issue is October 31, 2019 to December 3, 2020 (399 days).³ As established above, Corpron was not originally granted credit for this period of time because he was an inmate in his Jefferson County case. And, under *Torres* and *Muhammed*, this Court is not permitted to reexamine an original judgment and sentence when challenged following revocation of that sentence. As this Court has held, if an alleged "illegal sentence is challenged during a revocation proceeding held while the defendant is serving the suspended portion of the illegal sentence, the court, upon sentencing in the revocation proceeding, is constrained by the particulars of § 46-18-203(7), MCA."

³During that period of time, and although he was a DOC inmate in DC-18-060, Corpron's liberty was restricted in CDC-19-326 as follows: incarcerated at LCDC from October 31, 2019 to May 12, 2020; resident at MSH from May 13, 2020 to end of July 2020; and incarcerated at LCDC from end of July to December 3, 2020.

State v. Adams, 2013 MT 189, ¶ 18, 371 Mont. 28, 305 P.3d 808 (citing *Seals*, ¶ 15).

This rationale is compelling since the only way to conclude that Corpron should have been awarded credit for 399 additional days in his April 2023 disposition, would be to find that the district court was required to *sua sponte* recalculate Corpron's credit from his original judgment based on the rationale from *Killam*. Not only would reaching such a conclusion be counter to the rationale from *Adams* and *Torres*, but Corpron has not presented a legal argument to support why the court erred by not recalculating his original credit. Simply listing three date ranges and citing to *Killam* is insufficient. *See* M. R. App. P. 12(1)(g); *State v. Gunderson*, 2010 MT 166, ¶ 12, 357 Mont. 142, 237 P.3d 74 (not this Court's obligation to conduct legal research or develop legal analysis that might support a party's position). Without sufficient legal argument, Corpron has not met his burden under *Miller* and this Court need not address whether, at disposition, the district court should have *sua sponte* recalculated the original amount of credit. Nonetheless, should this Court consider this issue, such a claim would be unavailing.

Revocation proceedings are governed by § 46-18-203, MCA. *See, e.g., State v. Souther*, 2022 MT 203, ¶ 11, 410 Mont. 330, 519 P.3d 1; *Flesch v. Salmonsens*, OP 23-0349, 2023 Mont. LEXIS 716 (July 12, 2023). Since revocations are

expressly governed by § 46-18-203, MCA, *Killam*, which expressly relied upon § 201(9), would not be applicable to dispositional orders following a revocation. *See, e.g., Killam*, ¶ 17 (explaining § 46-18-201, MCA “sets forth ‘Sentences that may be imposed’ and applies” when a defendant is sentenced “for an offense for which the defendant has been found guilty”). And, as noted above, *Killam* could not have applied to Corpron’s December 2020 original sentence because it was not decided until August 2021.

Therefore, in addition to improperly bringing § 201(9) into a revocation proceeding, this Court would also have to conclude *Killam* and *Mendoza* created a new rule that should be retroactively applied in collateral proceedings. *See State v. Cook*, 2012 MT 34, ¶¶ 17-18, 364 Mont. 161, 272 P.3d 50; *Beach v. State*, 2015 MT 118, ¶¶ 13-20, 379 Mont. 74, 348 P.3d 629 (once conviction is final and relief is sought through collateral attack, “a ‘new rule’ applies only in limited circumstances”). In collateral proceedings, only “substantive rules” and “watershed procedural rules” are applied retroactively. *Id.* *Killam* and *Mendoza* created neither.⁴

⁴Even if it is presumed *Killam* and *Mendoza* created a “new rule,” those decisions did not create a “substantive rule” (*i.e.*, “alters the range of conduct or class of persons that the law punishes”). *Cook*, ¶¶ 17-18; *Beach*, ¶¶ 13-20. Instead, those decisions would qualify as a “procedural rule” (*i.e.*, regulating manner of determining culpability), but not a watershed procedural rule (*i.e.*, if not followed will create impermissibly large risk of inaccuracy). *Id.*

Corpron did not appeal his December 3, 2020 judgment and sentence. Nor did he appeal his April 27, 2023 order of revocation and disposition. Any relief that Corpron may be entitled to is governed by § 46-22-101(2), MCA, which is neither a substitute for raising legal questions on direct appeal nor a vehicle through which sentences upon revocation may be challenged.

A writ of habeas corpus is not a substitute for appeal. *State v. Wright*, 2001 MT 282, ¶ 13, 307 Mont. 349, 42 P.3d 753; § 46-22-101(1), MCA. Moreover, this Court has repeatedly explained that petitioners “cannot challenge [their] sentence upon revocation through this remedy of habeas corpus relief.” *Gowdy v. State*, OP 23-0446, 2023 Mont. LEXIS 869 (Aug. 29, 2023); *Flesch*, *supra*.

Corpron is serving a valid sentence since the credit for time served awarded to him was accurate. Since Corpron has not met his burden to demonstrate that he is illegally incarcerated in CDC-19-326, he is not entitled to habeas corpus relief. *Lott, supra*; *Miller*, ¶ 14; *Seals*, ¶ 7; *Killam*, ¶ 13.

CONCLUSION

This Court should DENY Corpron’s Petitions to the extent he challenges the following: original judgment and sentence in DC-18-060; original judgment and sentence in CDC-19-326; and dispositional order in CDC-19-326.

This Court should GRANT Corpron's Petition to the extent he properly challenges his dispositional order in DC-18-060 and remand the matter with instructions to enter an amended dispositional order awarding an additional 18 days of credit.

Respectfully submitted this 14th day of September, 2023.

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By: /s/ Katie F. Schulz
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CERTIFICATE OF COMPLIANCE

Pursuant to Rule 11 of the Montana Rules of Appellate Procedure, I certify that this response is printed with a proportionately spaced Times New Roman text typeface of 14 points; is double-spaced except for footnotes and for quoted and indented material; and the word count calculated by Microsoft Word for Windows is 3,872 words, excluding caption, signatures, certificate of compliance, certificate of service, and any exhibits.

/s/ Katie F. Schulz

KATIE F. SCHULZ

IN THE SUPREME COURT OF THE STATE OF MONTANA

No. OP 23-0423 and OP 23-0424

SILAS J. CORPRON,

Petitioner,

v.

JAMES SALMONSEN,

Warden,

Respondent.

EXHIBITS

Documents from

Fifth Judicial District Court Cause No. DC-18-060:

Register of Actions	Ex. 1
Motion for Leave to File Information and Affidavit in Support (Doc. 1; filed 11/13/18).....	Ex. 2
Bail Order Setting Bond and Conditions (Doc. 5; filed 11/14/18).....	Ex. 3
Minute Entry, Change of Plea Hearing (Doc. 10; 4/14/19)	Ex. 4
Minute Entry, Sentencing Hearing (Doc. 26; 10/30/19).....	Ex. 5
Findings, Judgment, and Sentence (Doc. 27; filed 11/6/19).....	Ex. 6
Petition/Affidavit for Revocation of Sentence and Probation (Doc. 35; filed 2/24/23).....	Ex. 7

Bench Warrant Served (Doc. 38; filed 2/28/23).....	Ex. 8
Minute Entry, Revocation Hearing (Doc. 46; 3/31/23)	Ex. 9
Minute Entry, Dispositional Hearing (Doc. 49, 4/12/23)	Ex. 10
Sentencing Order (Doc. 50; filed 4/12/23).....	Ex. 11

Documents from
First Judicial District Court Cause No. CDC-19-326:

Register of Actions	Ex. 12
Justice Court Bond Conditions (Doc. 5; filed 7/23/19).....	Ex. 13
Information (Doc. 4; filed 7/23/19).....	Ex. 14
Bond Posted-Bad Boy Bail Bonds (Doc. 12; filed 8/15/19)	Ex. 15
Verified Application and Motion to Revoke Order of Release and Redetermine Bail (Doc. 14; filed 9/26/19).....	Ex. 16
Warrant return (Doc. 16; filed 10/2/19).....	Ex. 17
Notice of Defense (Doc. 24; filed 11/15/19).....	Ex. 18
Motion to Commit the Defendant to [MSH for fitness determination] (Doc. 25; filed 11/22/19).....	Ex. 19

Order Committing the Defendant to [MSH for fitness determination] (Doc. 26; filed 11/25/19).....	Ex. 20
Motion to Extend [Commitment to MSH] (Doc. 28; filed 7/15/20).....	Ex. 21
Order Granting Motion to Extend [Commitment to MSH] (Doc. 29; filed 7/15/20).....	Ex. 22
MSH Report [pages 1 and 13 with redactions] (Doc. 30; filed 7/27/20).....	Ex. 23
Minute Entry, Change of Plea (Doc. 39, 11/19/20)	Ex. 24
Minute Entry, Sentencing (Doc. 41, 12/3/20)	Ex. 25
Judgment (Doc. 42; filed 12/15/20).....	Ex. 26
Petition to Revoke Defendant’s Suspended Sentence (Doc. 43, 2/22/23)	Ex. 27
Warrant Return (Doc. 45, 2/23/23)	Ex. 28
Amended Judgment and Commitment After Revocation (Doc. 52; filed 6/20/23).....	Ex. 29

CERTIFICATE OF SERVICE

I, Kathryn Fey Schulz, hereby certify that I have served true and accurate copies of the foregoing Response/Objection - Petition for Writ to the following on 09-14-2023:

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Electronically signed by LaRay Jenks on behalf of Kathryn Fey Schulz
Dated: 09-14-2023