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Attorney for Respondents

IN THE SUPREME COURT OF THE STATE OF MONTANA

No. OP 23-0453

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BRYCE PETERSON,

Petitioner,

v.

JIM SALMONSEN, Warden,  
MONTANA STATE PRISON,  
MONTANA BOARD OF PARDONS  
AND PAROLE,

Respondents.

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**RESPONDENTS' MOTION FOR EXTENSION OF TIME**

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The Respondents, Jim Salmonsens, Montana State Prison and Montana Board of Pardons and Parole, through counsel, respectfully request an extension of time for thirty days from September 22, 2023 until October 22, 2023, in which to prepare, serve, and file the State's response brief in the above-entitled matter. The response is presently due on September 22, 2023, and this is the Respondent's first request for extension of time.

Good cause exists for extending the deadline because the Department of Corrections' Legal Services Bureau continues to have three attorney vacancies, which has caused an increase in the workload of the undersigned. To the extent possible, counsel has exercised diligence and has substantial need for the extension.

Counsel for Petitioner Bryce Peterson has been contacted and does not object to the Respondents' request for additional time in which to file their Response Brief.

Based on the foregoing, Respondents request an Order granting an extension of time to file their response.

DATED this 20<sup>th</sup> day of September 2023.



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Colleen E. Ambrose  
Attorney for Respondents

## CERTIFICATE OF SERVICE

I, Colleen Elizabeth Ambrose, hereby certify that I have served true and accurate copies of the foregoing Motion - Unopposed to the following on 09-20-2023:

Colin M. Stephens (Attorney)  
315 W. Pine  
Missoula MT 59802  
Representing: Bryce Everett Peterson  
Service Method: eService

Austin Miles Knudsen (Govt Attorney)  
215 N. Sanders  
Helena MT 59620  
Representing: James Salmonsens  
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Colleen Elizabeth Ambrose (Govt Attorney)  
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Electronically signed by Kara Thompson on behalf of Colleen Elizabeth Ambrose  
Dated: 09-20-2023