

IN THE SUPREME COURT OF THE STATE OF MONTANA

Supreme Court No. DA 22-0342

STATE OF MONTANA,

Plaintiff and Appellee,

v.

JEREMY HOLMQUIST,

Defendant and Appellant.

DECLARATION OF COUNSEL

Pursuant to Mont. Code Ann. 1-5-105, I, Abigail Rogers, declare and state as follows:

1. I have personal knowledge of the facts set forth in this Declaration.
I am over the age of 18, and I am otherwise competent to testify. I represent the Appellant in this matter.
2. The Office of the Appellate Defender filed my notice of appearance on June 6, 2023.

3. Appellant's Opening Brief is currently due on October 12, 2023.
4. Mr. Holmquist recently arrived at the Missoula Pre-Release Center from the Montana State Prison.
5. After today's phone meeting with Mr. Holmquist and because he is now in Missoula, he asked for an extension of time so we can further discuss the merits of his appeal in person.
6. Due to my current caseload and hearing schedule, I need additional time to finish drafting the Opening Brief and to meet with Mr. Holmquist in person.
7. For these reasons, I am requesting an additional thirty days of time to file the Opening Brief. Such additional time is necessary to provide effective assistance of counsel and constitutes a substantial need for an extension.
8. If granted, I will complete the brief within the additional thirty days and will not request another extension of time.
9. I contacted the Office of the Attorney General, and the State does not object to my Motion for an Extension of Time.
10. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Respectfully submitted this 12th day of October 2023.

ABIGAIL ROGERS LAW, PLLC

By: /s/ Abigail Rogers
Abigail Rogers
Attorney for *Appellant*