

IN THE SUPREME COURT OF THE STATE OF MONTANA
DA 22-0655

STATE OF MONTANA,

Plaintiff and Appellee,

v.

CHRISTOPHER PAUL MCKEEN,

Defendant and Appellant.

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
OPENING BRIEF AND DECLARATION IN SUPPORT**

COMES NOW, Defendant and Appellant, CHRISTOPHER PAUL MCKEEN, by and through his counsel of record, Penelope S. Strong, pursuant Mont. R. App. Pro. 26 (1), and respectfully moves the Court for an Extension of Time to File Appellant's Opening Brief from February 26, 2024, to March 27, 2024.

The basis for this motion is contained in the attached Unsworn Declaration.

DATED this 26th day of February, 2024.

/s/ Penelope S. Strong
PENELOPE S. STRONG

DECLARATION

Pursuant to Mont. Code Ann. § 1-6-105, I Penelope S. Strong,
hereby declare as follows:

1. I am a licensed, practicing attorney in the State of Montana,
and am a sole practitioner with a full time caseload. Public
Defender cases are a significant portion of my current case
load.
2. The Opening Brief is presently due on February 26, 2024. This
is Appellant's Twelfth Motion for Extension of Time, and is
requesting a 30-day extension to file the Opening Brief.
3. I am currently working on this case, but will not be able to
complete it before it is due, as I have other intervening court
deadlines and hearings.
4. I will work diligently to complete the matter in the time
requested, which will not unduly delay this matter.
5. Opposing counsel has been contacted and does not object.

6. I hereby declare under penalty of perjury under the laws of the United States of America and the State of Montana that the foregoing is true and correct.

DATED this 26th day of February, 2024.

/s/ Penelope S. Strong
Penelope S. Strong
Attorney for Appellant

CERTIFICATE OF SERVICE

I, hereby certify that I have filed a true and accurate copy of the foregoing with the Clerk of the Montana Supreme Court; and that I have served true and accurate copies of the foregoing upon each attorney of record, and each party not represented by attorney in the above-referenced District Court action as follows:

Austin Miles Knudsen
Montana Attorney General
215 N. Sanders
Helena, MT 59620

Mardell Ployhar (Govt Attorney)
Assistant Attorney General
215 N. Sanders
Helena, MT 59620
406-444-9839
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Scott D. Twito (Govt Attorney)
PO Box 35025
Billings MT 59107
Representing: State of Montana
Service Method: eService

Dated this 26th day of February, 2024.

/s/ Julie K. Palmersheim
Julie K. Palmersheim

CERTIFICATE OF SERVICE

I, Penelope S. Strong, hereby certify that I have served true and accurate copies of the foregoing Motion - Unopposed to the following on 02-26-2024:

Chad M. Wright (Attorney)
P.O. Box 200147
Helena MT 59620-0147
Representing: Christopher P. McKeen
Service Method: eService

Austin Miles Knudsen (Govt Attorney)
215 N. Sanders
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Service Method: eService

Scott D. Twito (Govt Attorney)
PO Box 35025
Billings MT 59107
Representing: State of Montana
Service Method: eService

Electronically Signed By: Penelope S. Strong
Dated: 02-26-2024