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9 Attorney for Petitioner/Appellee

10 **IN THE SUPREME COURT OF THE STATE OF MONTANA**
11 **NO. DA 23-0473**

12 IN RE THE PARENTING OF: S.J.W., minor
13 child,

14 LEIGH PALMERI, f/k/a LEGH KRISE,
15 Petitioner and Appellee,

16 and,

17 JEFFERY A. WILLIAMS,
18 Respondent.

AFFIDAVIT OF JOSEPH M. RAFFIANI IN
SUPPORT OF UNOPPOSED MOTION OF
APPELLEE LEIGH PALMERI FOR
SECOND EXTENSION OF TIME TO FILE
ANSWER BRIEF

19 STATE OF MONTANA)
20) ss:
21 County of Yellowstone)

22 I, Joseph M. Raffiani, depose and state under oath as follows:

23 I am counsel for the Petitioner and Appellee, Leigh Palmeri, in the above-entitled matter.

24 I submit this affidavit in accordance with Rule 26(2), Mont. R. App. P. in support of the
25 Unopposed Motion for Second Extension of Time to File Answer Brief.

26 a. Petitioner and Appellee’s Answer Brief is Due February 28, 2024, *Order Granting
27 Extension of Time to File Answer Brief* (January 25, 2024). p. 1.

28 b. Appellee’s answer brief was first due on January 28, 2024. *Appellant’s Opening Brief*
(December 28, 2023).

- 1 c. Petitioner and Appellee respectfully requests an extension of time to file her answer
2 brief until March 6, 2024.
- 3 d. The reason the extension is necessary is that this attorney's calendar was
4 unexpectedly heavy with emergency proceedings since the first extension was
5 granted, requiring additional time for counsel to review the file and draft Appellee's
6 Answer Brief. This reason is also why this motion was not more timely filed; counsel
7 could not foresee and did not expect the delay.
- 8 e. Petitioner and Appellee, and her counsel, have exercised diligence because while the
9 brief is not yet complete, counsel has made progress and but for the unexpected
10 emergencies would have completed the brief in a timely fashion. Counsel expects that
11 with the extension of seven (7) days the brief can be completed.
- 12 f. Counsel for Respondent Appellant Jeffery A. Williams, and counsel for Appellee
13 Child Support Services Division, have been contacted regarding this motion and they
14 have no objection.

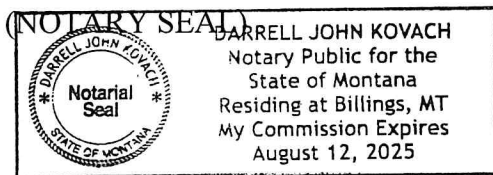
15 DATED this 28th day of February, 2024.

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Joseph M. Raffiani
Attorney for Petitioner/Appellee

SUBSCRIBED AND SWORN TO this 28th day of February, 2024, by Joseph M. Raffiani

Notary Public for the State of Montana



CERTIFICATE OF SERVICE

This is to certify that on this 28th day of February, 2024, a copy of the foregoing was duly served by email and/or first class mail, postage prepaid, upon the following:

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