

IN THE SUPREME COURT OF THE STATE OF MONTANA

No. DA 22-0661

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STATE OF MONTANA,

Plaintiff and Appellee,

v.

NANCY JEANNE CAHOON,

Defendant and Appellant.

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**UNOPPOSED MOTION FOR EXTENSION OF TIME**

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COMES NOW, Appellant Nancy Cahoon, through counsel, and respectfully requests an extension of time of thirty days until June 3, 2024, in which to prepare, file and serve the Appellant's reply brief in the above-entitled matter. This is Appellant's first request for an extension of time to file the reply brief. The reply is currently due May 10, 2024. A thirty-day extension is necessary to effectively represent Ms. Cahoon. The State was contacted and has no objection to this request for an extension of time.

Respectfully submitted this 6 day of May, 2024.

AVIGNONE, BANICK & WILLIAMS, PLLC  
By: /s/ Jennifer A. Dwyer  
Jennifer A. Dwyer

## **CERTIFICATE OF SERVICE**

I, Jennifer Dwyer, hereby certify that I have served a true and accurate copy of the foregoing UNOPPOSED MOTION FOR EXTENSION OF TIME- 30 DAYS- to the following, on May 6, 2024:

AUSTIN KNUDSEN  
Montana Attorney General  
215 North Sanders  
P.O. Box 201401  
Helena, MT 59620-1401  
Representing: State of Montana  
Service Method: eService

William Fullbright (Prosecutor)  
205 Bedford St. #C  
Hamilton, MT 59840  
Representing: State of Montana  
Service Method: eService

Tammy K Plubell  
Appellate Services Bureau Chief  
215 North Sanders  
P.O. Box 201401  
Helena, MT 59620-1401  
Representing: State of Montana  
Service Method: eService

DATED: May 6, 2024 BY: /s/ Jennifer Dwyer

## **CERTIFICATE OF SERVICE**

I, Jennifer Ann Dwyer, hereby certify that I have served true and accurate copies of the foregoing Motion - Unopposed to the following on 05-06-2024:

Chad M. Wright (Attorney)  
P.O. Box 200147  
Helena MT 59620-0147  
Representing: Nancy Jeanne Cahoon  
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Representing: State of Montana  
Service Method: eService

Electronically signed by Laurel Ashton Roser on behalf of Jennifer Ann Dwyer  
Dated: 05-06-2024