

ETHAN LERMAN
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Attorney for Respondent

IN THE SUPREME COURT OF THE STATE OF MONTANA

No. OP 24-0257

RACHEL RENE FLORES,

Petitioner,

v.

CAPT BRADLEY BRAGG,
Lewis & Clark Detention Center,

Respondent.

MOTION FOR EXTENSION OF TIME

The Respondent, through counsel, respectfully requests an extension of time, sixty days, until August 7, 2024, in which to prepare, serve, and file the State's Response Brief to the Petitioner's Writ of Mandamus in the above-entitled matter. The Response is presently due on June 7, 2024, and this is the Respondent's first extension request.

This Motion is made due to the heavy workload under which the Legal Services Bureau at the Department of Corrections is presently working, making

it extremely difficult to properly research, consider, and brief the issues raised by the Petitioner within the time allotted.

The Petitioner, Racel Flores, is currently incarcerated at the Lewis & Clark Detention Center. Respondent has called the Detention Center and left a message, but has not been able to speak with her as of the time of filing and her position is unknown at this time.

DATED this 24th day of May 2024.

/s/ Ethan Lerman
Ethan Lerman
Attorney for Respondent

CERTIFICATE OF SERVICE

I certify that on or about the 24th day of May 2024, I mailed a true and correct copy of the foregoing by U. S. Mail, postage prepaid to the following:

Rachel Flores
(Inmate) Lewis & Clark Detention Center
221 Breckenridge St,
Helena, Montana 59601

/s/ Ethan Lerman

CERTIFICATE OF SERVICE

I, Ethan C. Lerman, hereby certify that I have served true and accurate copies of the foregoing Motion - Extension of Time to the following on 05-24-2024:

Austin Miles Knudsen (Govt Attorney)
215 N. Sanders
Helena MT 59620
Representing: Bradley Bragg
Service Method: eService

Colleen Elizabeth Ambrose (Govt Attorney)
5 S LAST CHANCE GULCH
PO Box 201301
HELENA MT 59601-
Representing: Bradley Bragg
Service Method: eService

Rachell Rene Flores (Petitioner)
AO#2063974
Lewis & Clark County Detention Center
221 Breckenridge
Helena MT 59601
Service Method: Conventional

Electronically Signed By: Ethan C. Lerman
Dated: 05-24-2024