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CLERK OF THE SUPREME COURT STATE OF MONTANA

Case Number: DA 24-0263

Benjamin Reed Delli Bovi, Martin, & Reed, LLC 34 W. 6th Ave., Ste 2E Helena, MT 59601

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ATTORNEY FOR DEFENDANT AND APPELLEE

IN THE SUPREME COURT OF THE STATE OF MONTANA

No. DA 24-0263

STATE OF MONTANA,

Plaintiff and Appellant,

v.

THOMAS JOSEPH BRENNAN,

Defendant and Appellee.

UNOPPOSED MOTION FOR EXTENSION OF TIME

The Appellee, Thomas Joseph Brennan, respectfully requests a 30-day extension of time until September 27, 2024, in which to prepare, serve, and file his response brief in the above-entitled matter. The brief is presently due on August 29, 2024, and this is his first extension request.

This motion is made due to the heavy workload under which the attorney assigned to this case is presently working, making it impossible to properly research, consider, and brief the issues within the time allotted.

Opposing counsel has been contacted concerning this motion and does not object.

Respectfully submitted this 28th day of August, 2024.

Benjamin Reed Delli Bovi, Martin, & Reed, LLC 34 W. 6th Ave., Ste 2E Helena, MT 59601

<u>/s/Benjamin Reed</u>
Benjamin Reed
Attorney for Defendant-Appellee

CERTIFICATE OF SERVICE

I, Benjamin Reed, hereby certify that I have served true and accurate copies of the foregoing Motion - Unopposed to the following on 08-28-2024:

Michael P. Dougherty (Govt Attorney) 215 North Sanders P.O. Box 201401 Helena, MT 59620-1401 Representing: State of Montana

Service Method: eService

Tammy K Plubell (Govt Attorney) 215 N. Sanders Helena MT 59601 Representing: State of Montana Service Method: eService

Jessica L. Best (Govt Attorney) 228 Broadway Helena MT 59601 Representing: State of Montana Service Method: eService

Kevin Downs (Govt Attorney) 228 E. Broadway Helena, MT MT 59601 Representing: State of Montana Service Method: eService

/s/ Benjamin Reed
Benjamin Reed
Attorney for Defendant-Appellee

CERTIFICATE OF SERVICE

I, Benjamin W. Reed, hereby certify that I have served true and accurate copies of the foregoing Motion - Unopposed to the following on 08-28-2024:

Tammy K Plubell (Govt Attorney) 215 N. Sanders

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Michael Patrick Dougherty (Govt Attorney)

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Representing: State of Montana

Service Method: eService

Electronically Signed By: Benjamin W. Reed

Dated: 08-28-2024