

## IN THE SUPREME COURT OF THE STATE OF MONTANA

## Supreme Court Cause No. DA 24-0453

Jacquelyn M. Hughes  
HUGHES LAW, P.L.L.C.  
1690 Rimrock Rd. Ste. F.  
Billings, MT 59102  
Phone: (406) 855-4979  
jhughes@hugheslawmt.com

Attorney for Estate of Celia Scheihing

---

ESTATE OF CELIA L.  
SCHEIHING  
Appellant,

vs.

PROGRESSIVE DIRECT  
INSURANCE COMPANY,

Appellee.

---

)  
)  
)  
)  
) **MOTION FOR THIRTY DAY**  
) **EXTENSION OF TIME TO FILE**  
) **APPELLANT'S OPENING BRIEF**  
)  
)  
)

Appellant Estate of Celia Scheihing, hereby asks the Court for a thirty-day extension of time to file her opening brief. This request is being made on the basis that Appellee was unable to mediate until September 11, 2024. Opposing Counsel has been contacted and does not oppose this *Motion*. A proposed order granting this *Motion* is submitted herewith at Exhibit A.

Dated this 11<sup>th</sup> day of September 2024.

/s/ Jacquelyn M. Hughes  
Attorney for the Estate of Celia Scheihing

EXHIBIT A

IN THE SUPREME COURT OF THE STATE OF MONTANA

Supreme Court Cause No. DA 24-0453

---

ESTATE OF CELIA L.  
SCHEIHING  
Appellant,

vs.

PROGRESSIVE DIRECT  
INSURANCE COMPANY,

Appellee.

---

)  
)  
)  
)  
)  
)  
)  
)  
)  
)

**ORDER GRANTING MOTION  
FOR THIRTY DAY EXTENSION  
OF TIME TO FILE APPELLANT’S  
OPENING BRIEF**

UPON MOTION of Appellant Estate of Celia Scheihing, with the consent of Appellee Progressive Direct Insurance Company, Appellant is granted until October 11, 2024 to file its opening brief.

## **CERTIFICATE OF SERVICE**

I, Jacquelyn Marjorie Hughes, hereby certify that I have served true and accurate copies of the foregoing Motion - Unopposed to the following on 09-11-2024:

Peter Babbel Ivins (Attorney)  
PO Box 9440  
235 E. Pine St.  
Missoula MT 59807  
Representing: Progressive Direct Insurance Company  
Service Method: eService

Mark S. Williams (Attorney)  
235 East Pine  
PO BOX 9440  
Missoula MT 59807-9440  
Representing: Progressive Direct Insurance Company  
Service Method: eService

Electronically Signed By: Jacquelyn Marjorie Hughes  
Dated: 09-11-2024