

Nathan J. Hoines
James R. Olsen
Denise R. LaFontaine
HOINES LAW OFFICE, P.C.
Attorney at Law
401 3rd Avenue North
P.O. Box 829
Great Falls, MT 59403-0829
Phone: (406) 761-0996
Email: office@nathanhoineslaw.com

COUNSEL FOR DEFENDANT AND APPELLANT

IN THE SUPREME COURT OF THE STATE OF MONTANA
No. DA 24-0526

STATE OF MONTANA,

Plaintiff and Appellee,

v.

TAYLOR JEAN CARLSON,

Defendant and Appellant.

**FIRST UNOPPOSED MOTION FOR EXTENSION OF DEADLINE
TO FILE OPENING BRIEF**

On Appeal from the Montana Eighth Judicial Court
In and For Cascade County, Hon. John W. Parker

The Appellant, Taylor Jean Carlson, respectfully requests a 30-day extension of time until December 14th, 2024, in which to file and serve their opening brief in the above-titled matter. The brief is presently due on November 14th, 2024, and this is the Appellant's first extension request.

Appellant makes this motion due to the heavy caseload counsel for Appellant is currently working, making it very difficult to properly research, consider, and brief the Court fully on the matter presented within the time allotted.

Counsel for the State has been contacted and does not object to this motion.

Respectfully submitted this 13th day of November 2024.

HOINES LAW OFFICE, P.C.

By /s/ Nathan J. Hoines
Nathan J. Hoines
James R. Olsen
Denise R. LaFontaine
Attorneys for Appellant

CERTIFICATE OF SERVICE

I, Nathan J. Hoines, hereby certify that I have served true and accurate copies of the foregoing Motion - Unopposed to the following on 11-13-2024:

James R. Olsen (Attorney)
401 3rd Avenue North
P.O. Box 829
Great Falls MT 59403
Representing: Taylor Jean Carlson
Service Method: eService

Austin Miles Knudsen (Govt Attorney)
215 N. Sanders
Helena MT 59620
Representing: State of Montana
Service Method: eService

Joshua A. Racki (Govt Attorney)
121 4th Street North
Suite 2A
Great Falls MT 59401
Representing: State of Montana
Service Method: eService

Matthew S. Robertson (Govt Attorney)
121 4th Street North
Great Falls MT 59401
Representing: State of Montana
Service Method: eService

Electronically Signed By: Nathan J. Hoines
Dated: 11-13-2024