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COUNSEL FOR THE STATE

IN THE SUPREME COURT OF THE STATE OF MONTANA

No. DA 23-0430

STATE OF MONTANA,

Plaintiff and Appellee,

v.

JEFFREY SCOTT ANDERSON,

Defendant and Appellant.

**UNOPPOSED MOTION FOR EXTENSION OF TIME
AND DECLARATION IN SUPPORT**

The Appellee, State of Montana, respectfully requests a 30-day extension of time until December 21, 2024, in which to prepare, file, and serve its response brief in the above-entitled matter.

In support of this motion, undersigned counsel submits the following Declaration.

Dated this 13th day of November, 2024.

AUSTIN KNUDSEN
Montana Attorney General
P.O. Box 201401
Helena, MT 59620-1401

By: /s/ Katie F. Schulz
KATIE F. SCHULZ
Assistant Attorney General

DECLARATION

Pursuant to Mont. Code Ann. § 1-6-105, I, Katie F. Schulz, hereby declare as follows:

1. I am a licensed, practicing attorney in the State of Montana, and am currently employed by the Montana Department of Justice, Office of Attorney General, Appellate Section, as an Assistant Attorney General.
2. In my capacity as Assistant Attorney General, I was assigned to handle the above-entitled matter on August 28, 2024.
3. The State's response brief is presently due on November 21, 2024. This is the State's third Motion for Extension of Time.
4. Due to my current workload, I have been unable to finalize the State's response brief and consult with the prosecuting attorney about this case.

5. Since being assigned this case, I have completed stipulations or appellate briefs in the following matters: *E.D. vs. Thirteenth Judicial District Court*, Case No. OP 24-0533, filed September 16, 2024; *State v. Avidiya*, Case No. DA 22-0541, filed September 18, 2024; *LaForge v. Salmonsens*, Case No. OP 24-0495, filed September 27, 2024; *In re K.W.*, Case No. DA 24-0294, joint stipulation filed on September 30, 2024; *Cheatam v. Salmonsens*, OP 24-0451, filed October 7, 2024; *In re M.N.*, Case No. DA 24-0352, filed October 24, 2024; *State v. McCrea*, Case No. DA 24-0178, filed October 30, 2024; and *In re A.R.*, Case No. DA 24-0423, to be filed by November 18, 2024.

6. In addition, I have been assigned to file a response brief in the following cases: *State v. Pillans*, Case No. DA 23-0430, due November 24, 2024; *State v. Keach*, Case No. DA 23-0502, due November 29, 2024; *Bokma v. Olsen*, Case No. OP 24-0575, due December 1, 2024; *In re M.S.-L.*, Case No. DA 24-0388, due December 4, 2024; *State v. LaForge*, Case No. DA 23-0147, due December 17, 2024; and *State v. Jackson*, Case No. DA 23-0048, due January 2, 2025.

7. I will work diligently to complete the matter in the time requested, if not before.

8. Opposing counsel, James Siegman, has been contacted and does not oppose this motion.

9. I hereby declare under penalty of perjury under the laws of the United States of America and the State of Montana that the foregoing is true and correct.

Respectfully submitted this 13th day of November, 2024.

/s/ Katie F. Schulz
KATIE F. SCHULZ

CERTIFICATE OF SERVICE

I, Kathryn Fey Schulz, hereby certify that I have served true and accurate copies of the foregoing Motion - Unopposed to the following on 11-13-2024:

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Electronically signed by Wendi Waterman on behalf of Kathryn Fey Schulz
Dated: 11-13-2024