

AUSTIN KNUDSEN
Montana Attorney General
CHRISTINE HUTCHISON
Assistant Attorney General
215 North Sanders
P.O. Box 201401
Helena, MT 59620-1401
Phone: 406-444-2026
chutchison@mt.gov

COUNSEL FOR PLAINTIFF AND APPELLEE

IN THE SUPREME COURT OF THE STATE OF MONTANA

No. DA 22-0632

STATE OF MONTANA,

Plaintiff and Appellee,

v.

LORENZO JAMES HARRIS,

Defendant and Appellant.

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

The Appellee, State of Montana, respectfully requests a 30-day extension of time until January 9, 2025, 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.

Respectfully submitted this 3rd day of December, 2024.

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

By: /s/ Christine Hutchison
CHRISTINE HUTCHISON
Assistant Attorney General

DECLARATION

Pursuant to Mont. Code Ann. § 1-6-105, I, Christine Hutchison, 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 the Attorney General, Appellate Services Bureau, as an Assistant Attorney General.
2. In my capacity as Assistant Attorney General, I have been assigned to handle the above-entitled matter.
3. The brief is presently due on December 10, 2024. This is the State's fourth extension request, and I am requesting a 30-day extension of time until January 9, 2025, to file my brief.

4. I have been unable to complete this case due to my workload.

Additional time is needed to review the record, research, consult with the trial prosecutor, and draft the response. In the last month I filed a response brief in DA 23-0251, *State v. Brady*. I have also been drafting an Answer in response to a federal habeas petition in *Patterson v. Salmonsens*, which I anticipate filing on or before December 17, 2024.

5. The undersigned attempted to contact opposing counsel, but at the time this motion was filed has not learned counsel's position on this extension.

6. I will work diligently to complete the briefing within the requested period.

7. 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 3rd day of December, 2024.

/s/ Christine Hutchison
CHRISTINE HUTCHISON

CERTIFICATE OF SERVICE

I, Christine M. Hutchison, hereby certify that I have served true and accurate copies of the foregoing Motion - Extension of Time to the following on 12-03-2024:

Scott D. Twito (Govt Attorney)
PO Box 35025
Billings MT 59107
Representing: State of Montana
Service Method: eService

Tammy Ann Hinderman (Attorney)
Office of State Public Defender
Appellate Defender Division
P.O. Box 200147
Helena MT 59620
Representing: Lorenzo James Harris
Service Method: eService

Melinda Ann Driscoll (Attorney)
2624 Minnesota Avenue
P.O. Box 1337
Billings MT 59103
Service Method: eService
E-mail Address: melinda@pklawmt.com

Electronically signed by Wendi Waterman on behalf of Christine M. Hutchison
Dated: 12-03-2024