

IN THE SUPREME COURT OF THE STATE OF MONTANA

No. DA 23-0528

STATE OF MONTANA,

Plaintiff and Appellee,

v.

ROBERT DAN FRENCH,

Defendant and Appellant.

**UNOPPOSED MOTION FOR EXTENSION OF TIME
WITH AFFIDAVIT IN SUPPORT**

COMES NOW, Jeff N. Wilson, Assistant Appellate Defender for the Appellate Defender Division, and respectfully requests an extension of time until January 3, 2025, in which to prepare, file, and serve the Appellant's opening brief in the above-entitled matter. This is Appellant's eleventh request for an extension. Appellant's opening brief was first due February 21, 2024. Appellant's opening brief is currently due December 20, 2024. Appellant submits the attached affidavit in support of this motion.

Opposing counsel has been contacted and has no objection.

Respectfully submitted this 12th day of December, 2024.

OFFICE OF STATE PUBLIC DEFENDER
APPELLATE DEFENDER DIVISION
P.O. Box 200147
Helena, MT 59620-0147

By: /s/ Jeff N. Wilson
JEFF N. WILSON
Assistant Appellate Defender

STATE OF MONTANA)
 : ss.
County of Missoula)

I, Jeff N. Wilson, in compliance with M. R. App. P. 26(2), declare:

1. I am a licensed, practicing attorney in the State of Montana, and I am currently employed by the Appellate Defender Division of Office of State Public Defender (ADD).
2. Appellant's opening brief was first due February 21, 2024. The brief is presently due December 20, 2024. This is Appellant's eleventh extension request and my fourth extension request as appointed counsel. I request an extension of 14 days to submit the opening brief.
3. I am in substantial need of an extension. I have a complete draft of an opening brief. I need additional time to make final edits, citation checks, proofread, and final formatting. Staff that assists with these tasks has at least two other opening briefs to complete in the next several days. A short extension of 14 days is needed to complete these final tasks.
4. Appellant is currently incarcerated in Saguaro, Arizona.

5. The State was contacted on December 11, 2024, and does not object to this request.
6. I will work diligently to complete the matter in the time requested.
7. I declare under penalty of perjury that the above is true and correct.

/s/ Jeff Wilson
Jeff N. Wilson, Missoula, Montana

December 12, 2024
Date

CERTIFICATE OF SERVICE

I, Jeff N. Wilson, hereby certify that I have served true and accurate copies of the foregoing Motion - Unopposed to the following on 12-12-2024:

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

Electronically signed by Kat J. Hahm on behalf of Jeff N. Wilson
Dated: 12-12-2024