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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.

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

The Appellee, State of Montana, respectfully requests a 30-day extension of time until February 8, 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 31st 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 January 9, 2025. This is the State's fifth extension request, and I am requesting a 30-day extension of time until February 8, 2025, to file my brief.

4. In the past month I have researched and completed a draft of an Answer in response to a federal habeas petition in *Patterson v. Salmonsens*. The federal habeas matter involved several extensive records and numerous claims which delayed my ability to begin reviewing the record or researching issues for *State v. Harris*.

5. Opposing counsel has been contacted concerning this motion and she does not object.

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 31st 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 - Unopposed to the following on 12-31-2024:

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
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P.O. Box 200147
Helena MT 59620
Representing: Lorenzo James Harris
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Melinda Ann Driscoll (Attorney)
2624 Minnesota Avenue
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Billings MT 59102
Representing: Lorenzo James Harris
Service Method: Conventional

Electronically signed by Wendi Waterman on behalf of Christine M. Hutchison
Dated: 12-31-2024