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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 March 10, 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 6th day of February, 2025.

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 February 8, 2025. This is the State's sixth extension request, and I am requesting a 30-day extension of time until March 10, 2025, to file my brief.

4. In the last month I have reviewed the record for this matter and completed a substantial portion of the State's response brief. I also filed an Answer in response to a federal habeas petition in *Patterson v. Salmonsens*.

On January 31, 2025, I filed an Unopposed Motion to Stay the Appeal and Correct the Record in the current matter. Given the request for a stay, I did not file a motion for an extension of time for the State's response brief. However, if the Court issues an order on the motion to stay after February 8, 2025, or if the Court denies the motion to stay, the State will need additional time to complete the brief and consult with the Yellowstone County Attorney's Office.

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 6th day of February, 2025.

/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 02-06-2025:

Scott D. Twito (Govt Attorney)
PO Box 35025
Billings MT 59107
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Tammy Ann Hinderman (Attorney)
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Electronically signed by Wendi Waterman on behalf of Christine M. Hutchison
Dated: 02-06-2025