FILED

04/25/2025

Bowen Greenwood CLERK OF THE SUPREME COURT STATE OF MONTANA

Case Number: DA 25-0052

SUPREME COURT OF THE STATE OF MONTANA CASE NO. DA 25-0052

HERU SPENCER,

Plaintiff Appellant,

VS.

CHASE SKOGEN PROPERTY MANAGEMENT, INC., a Montana Corporation,

Defendant, Counter-Plaintiff, and Appellee.

APPELLEE'S MOTION FOR EXTENSION OF TIME TO FILE APPELLEE'S OPENING BRIEF

On Appeal from the Montana Eighteenth Judicial District, Gallatin County Cause No. DV 16-2023-796B Before Hon. Peter B. Ohman

Appearances:

Robert D. Reiley (#14290) THE RABB LAW FIRM, PLLC 3950 Valley Commons Drive, Suite 1 Bozeman, MT 59718 Telephone: (406) 404-1747 Facsimile: (406) 551-6847 service@therabblawfirm.com *Attorney for Appellee* Heru Spencer 2201 Baxter Lane, # 4523 Bozeman, MT 59718 Telephone: 406-333-8841 nuada999@gmail.com *Appellant in Pro Per* Appellee Chase Skogen Property Management, LLC, by and through undersigned counsel and pursuant to Montana Rule of Appellate Procedure 26(1), respectfully moves this Court for a 30-day extension of time in which to file Appellee's Opening Brief. Appellee¹ seeks such extension in order to fully address questions raised in Appellant's Opening Brief, and a change in handling attorney requires additional review of the prior litigation history to fully address and analyze issues, as well as previously scheduled litigation impairing Appellee's counsel's effort to fully address such questions within 30 days after service of the brief of the Appellant. Appellant has been contacted concerning the motion and opposes the Extension. Appellant was provided an unopposed 30-Day Extension to file the Appellant Opening Brief.

Dated: April 25, 2025

THE RABB LAW FIRM, PLLC

Robert D. Reiley Attorney for Appellee

¹ Seth Chase, a member of Chase-Skogen Property Management, Inc., was improperly added in the caption of Appellant's Opening Brief. Seth Chase as an individual is not a Party to the matter on appeal.

CERTIFICATE OF SERVICE

I, Robert D Reiley, hereby certify that I have served true and accurate copies of the foregoing Motion - Opposed to the following on 04-25-2025:

Heru Spenser (Appellant) PO Box 4523 Bozeman MT 59772 Service Method: E-mail Delivery

> Electronically signed by Susan Russell on behalf of Robert D Reiley Dated: 04-25-2025