

IN THE SUPREME COURT OF THE STATE OF MONTANA
Supreme Court Cause No. DA 24-0408

HEIDI A. GABERT

Plaintiff/Appellee,

and

DAWN FREEMAN

Intervenor/Appellee

v.

GARRY DOUGLAS SEAMAN,

Defendant/Appellant.

On Appeal from the Montana Nineteenth Judicial District Court
Cause No. DV-22-95
Hon. Shane Vannatta, Presiding

**APPELLANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE REPLY BRIEF**

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Comes now Appellant Garry Seaman, through counsel, and under Rule 26 of the Montana Rules of Appellate Procedure, moves the Court for a 30-day extension of time up to and including June 6, 2025, to file his reply brief. The reply brief is currently due May 7, 2025. A declaration is filed with this motion as provided under Mont. R. App. P. 26. Counsel for each of the Appellees have been contacted and do not object to this motion. This is Mr. Seaman's first request for an extension to file his reply brief.

DATED: April 29, 2025.

WORDEN THANE P.C.
Attorneys for Defendant/Appellant



Dillon Kato

DECLARATION

I, Dillon Kato, in compliance with Mont. R. App. P. 26(2) and under Mont. Code Ann. § 1-6-105, declare:

1. I am a licensed, practicing attorney in the State of Montana, and am employed as an associate attorney at the law firm Worden Thane P.C.
2. I am assisting in this appeal on behalf of Appellant Garry Seaman.
3. Appellant's Reply Brief was originally due May 7, 2025.
4. I am requesting an additional 30 days, until June 6, 2025, to complete and file the Reply Brief.
5. Appellant has not previously requested an extension to file the Reply Brief.
6. I am in substantial need of an extension. Due to my current workload, I will be unable to finalize Appellant's Reply Brief by the current deadline. In particular, I am currently preparing for a hearing in a disputed eviction and real estate ownership matter, drafting motions for summary judgment in two other district court matters, and have a number of hearings set for a Missoula-based client over the coming weeks. Additionally, I am also working on a response to a motion recently filed by the Appellees in the District Court in this matter.

7. I have started reviewing the Appellees' Response Brief and drafting a Reply Brief. I will continue to work diligently on this appeal, and believe the Reply Brief will be completed in the time requested, if not before.

8. Counsel for Appellee Heidi Gabert and counsel for Appellee Dawn Freeman have been contacted about this request and do not oppose.

9. I declare under penalty of perjury that the foregoing is true and correct.

DATED: April 29, 2025.


Dillon Kato

CERTIFICATE OF SERVICE

I, Dillon M. Kato, hereby certify that I have served true and accurate copies of the foregoing Motion - Unopposed to the following on 04-29-2025:

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Electronically signed by Christina DiMuro on behalf of Dillon M. Kato
Dated: 04-29-2025