

IN THE SUPREME COURT OF THE STATE OF MONTANA

Supreme Court Cause No. DA 25-0076

Lincoln Palmer  
Rex Palmer  
ATTORNEYS INC., P.C.  
301 W Spruce  
Missoula, MT 59802  
(406) 728-4514  
lpalmer@attorneysincpc.com  
firm@attorneysincpc.com  
ATTORNEYS FOR APPELLANT

Amber Rose D’Hooge,	)	
	)	
<i>Plaintiff and Appellant,</i>	)	<b>DECLARATION OF</b>
v.	)	<b>LINCOLN PALMER</b>
	)	
Cincinnati Insurance Company,	)	
	)	
<i>Defendant and Appellee.</i>	)	

\* \* \* \* \*

I, Lincoln Palmer, declare from my personal knowledge that the following facts are true:

1. I am an attorney licensed to practice before the Montana Supreme Court. I represent Amber D’Hooge.
2. I understand that motions for over-length appellate briefs are not routinely granted.
3. The draft of my Opening Brief in this case, taking into account only the fact section, procedural history section, and the first issue on appeal, currently totals over 8,000 words.

4. The draft of my Opening Brief, totaling every section, including analysis of each of Amber's nine separate causes of action, currently totals over 16,000 words.
5. The undersigned believes that limiting Amber to 10,000 words in her Opening Brief would dramatically affect the undersigned's ability to effectively advocate for reversal, and thus quite likely affect the merits of this appeal.
6. This law firm by which I am employed has been actively engaged in the practice of law in Montana since 1981 and has presented numerous briefs in appeals before this Court, as well as other appellate courts such as the Ninth Circuit Court of Appeals, and Tribal Appellate Court. On inquiry and belief, no attorney at this law firm has ever before requested an over-length appellate brief. This request is based on the unique circumstances set out above.

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

Executed on May 2, 2025.

/s/Lincoln Palmer  
ATTORNEYS INC., P.C.  
301 W Spruce  
Missoula, MT 59802  
ATTORNEYS FOR APPELLANT