

IN THE SUPREME COURT OF THE STATE OF MONTANA
DA 26-0101

MORGAN JOHNSON and AMY JOHNSON, individually and as the parents of
ADRIANNA JOHNSON, a deceased minor; and the ESTATE of ADRIANA
JOHNSON,

Plaintiffs and Appellees,

v.

KEY SAFETY SYSTEMS, INC. d/b/a JOYSON SAFETY SYSTEMS f/k/a
BREED TECHNOLOGIES, INC., a foreign corporation; JOYSON SAFETY
SYSTEMS ACQUISITION LLC, a foreign limited liability company,

Defendants and Appellants,

v.

STELLANTIS N.V., f/k/a FIAT CHRYSLER AUTOMOBILES N.V. d/b/a
MOPAR, a foreign corporation.; FCA USA LLC, f/k/a CHRYSLER GROUP LLC
and NEW CARCO ACQUISITION LLC, f/d/b/a MOPAR, a foreign limited
liability company; FCA MEXICO LLC, a foreign limited liability company;
RONAN CHRYSLER DODGE JEEP RAM, a domestic corporation; DANHOF
CHEVROLET, INC., a domestic corporation; JOHN DOES 1-6; and DOE
BUSINESS ENTITIES 1-10,

Defendants.

**APPELLANTS' MOTION FOR EXTENSION OF TIME TO FILE
OPENING BRIEF**

Chad E. Adams
Hallee C. Frandsen
Browning, Kaleczyc, Berry &
Hoven, P.C.
800 N. Last Chance Gulch, Suite 10
P.O. Box 1697
Helena, MT 59624
(406) 443-6820 (phone)
(406) 443-6883 (fax)
chad@bkbh.com
hallee@bkbh.com

*Attorneys for Key Safety Systems,
Inc. and Joyson Safety Systems
Acquisition, Inc.*

Jason Hartman
Jillian Perry
David Tippetts
Weinstein Tippetts & Little LLP
7500 San Felipe, Suite 500
Houston, Texas 77063
(713) 244-0800 (phone)
(713) 244-0801 (fax)
Jason.hartman@wtllaw.com
Jillian.perry@wtllaw.com
David.tippetts@wtllaw.com

*Pro Hac Vice Attorneys for Key
Safety Systems, Inc. and Joyson
Safety Systems Acquisition, Inc.*

Alex K. Evans
Wayne Olson
GLACIER LAW FIRM, PLLC
165 Commons Loop, Suite 3
Kalispell, MT 59901

*Attorneys for Morgan Johnson and
Amy Johnson and the Estate of
Adrianna Johnson*

Jill Gerdrum
Hall & Evans, LLC
Millennium Building
125 Bank Street, Suite 403
Missoula, MT 59802
(406) 532-2635 (phone)
gerdrumj@hallevans.com

Attorneys for FCA US, LLC

Perry Schneider
Sean D. Peterson
Milodragovich, Dale & Steinbrenner, P.C.
620 High Park Way
Missoula, MT 59803
perrys@bigskylawyers.com
speterson@bigskylawyers.com

Attorneys for Danhof Chevrolet, Inc.

Marcel Quinn
Hammer, Quinn, & Shaw PLLC
100 Financial Drive, Suite 100
Kalispell, MT 59901
marcelquinn@attorneysmontana.com
toddhammer@attorneysmontana.com

*Attorneys for Ronan Motors Corporation
d/b/a Ronan Chrysler Dodge Jeep Ram*

Appellants Key Safety Systems, Inc. and Joyson Safety Systems Acquisition LLC, through counsel of record, move the Court pursuant to M.R.App.P. 26(1) for an extension of thirty days to file its opening brief. Rule 26(1), M.R.App.P. provides that a “party may move for and be granted one 30-day extension of time in which to file a brief required or allowed to be filed under these rules.”

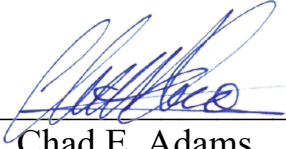
Absent an extension, Appellants opening brief would be due on April 22, 2026. With the requested thirty-day extension, Appellants’ opening brief will be due on May 22, 2026.

Pursuant to M.R.App.P. 26(1), counsel for the opposing parties have been contacted and do not object to this motion.

For the reasons stated herein, Appellants respectfully request the Court grant its motion for an extension of time. A proposed order has been filed herewith.

Dated this 15th day of April 2026.

BROWNING, KALECZYC, BERRY & HOVEN, P.C.

By  _____
Chad E. Adams
Hallee C. Frandsen

CERTIFICATE OF SERVICE

I, Chad E. Adams, hereby certify that I have served true and accurate copies of the foregoing Motion - Extension of Time to the following on 04-15-2026:

Wayne E. Olson (Attorney)
165 Commons Loop, Ste. 3
Kalispell MT 59901
Representing: Amy Johnson, Morgan Johnson, Adriana Johnson
Service Method: eService

Alexander Kendall Evans (Attorney)
165 Commons Loop
Ste 3
Kalispell MT 59901
Representing: Amy Johnson, Morgan Johnson, Adriana Johnson
Service Method: eService

Hallee C. Frandsen (Attorney)
PO Box 1697
800 N. Last Chance Gulch, Ste. 101
Helena MT 59624
Representing: Joyson Safety Systems Acquisition LLC, Key Safety Systems, Inc.
Service Method: eService

Electronically Signed By: Chad E. Adams
Dated: 04-15-2026