

**IN THE SUPREME COURT
STATE OF NORTH DAKOTA**

WILLIAM KAINZ AND GEOCHEMICALS,)	
LLC,)	
)	Supreme Court No. 202200135
<i>Plaintiffs and appellants,</i>)	Civil No. 45-2019-CV-00703
)	
Vs.)	
)	
JACAM CHEMICAL COMPANY 2013,)	
LLC,)	
)	
<i>Defendant and Appellee.</i>)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE BRIEF
OF APPELLEE JACAM CHEMICAL COMPANY 2013, LLC**

ON APPEAL FROM *ORDER GRANTING MOTION TO ABATE* (R258), *ORDER DENYING MOTION FOR RECONSIDERATION OF ORDER GRANTING MOTION TO ABATE* (R272), *ORDER GRANTING MOTION TO ATTORNEYS FEES* (R285), AND *JUDGMENT* (R288)

Southwest Judicial District Court,
Stark County, North Dakota,
The Honorable William Herauf
Civil No. 2019-Cv-00703

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[¶ 1] Pursuant to N.D.R. App. P. 26(b), Jacam Chemical Co. 2013, LLC (hereinafter “Appellee”), through its undersigned legal counsel, hereby requests a 14-day extension of time to file its Brief in the above-entitled action. The current due date for the Appellee’s Brief is September 12, 2022. To the extent the motion is granted, the new deadline would fall on or before September 26, 2022.

[¶ 2] The bases for this request are that on August 30, 2022, the Court in the *Jacam Chemical Company 2013, LLC v. William A. Kainz, Geochemicals, LLC, and Gene Zaid, et al.* case, which is pending in the District Court of Rice County, Kansas (Case No. 2019-CV-000021) granted William Kainz and Geochemicals’ Motion for Leave to File Amended Pleadings. Appellants’ undersigned legal counsel needs additional time to review and analyze the effects of this orders on this appeal. This Motion is unopposed.

[¶ 3] It is respectfully contended that good cause has been shown herein for the requested extension, but we request that the Court advise us if additional explanation is necessary.

Dated this 6th day of September, 2022.

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CERTIFICATE OF COMPLIANCE

[¶]4 The undersigned, as attorneys for the Appellee in the above matter, and as the author of the above brief, hereby certify, in compliance with Rule 32(a) of the North Dakota Rules of Appellate Procedure, that the above brief was prepared with proportional type face in 12-point font and equals 3 pages, exclusive of this Certificate of Compliance.

Dated this 6th day of September, 2022.

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