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Attorneys for Defendant NorthWestern Corporation

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

**PORTLAND GENERAL
ELECTRIC COMPANY; AVISTA
CORPORATION; PACIFICORP;
and PUGET SOUND ENERGY, INC.**

Plaintiffs,

v.

**NORTHWESTERN
CORPORATION; TALEN
MONTANA, LLC; AUSTIN
KNUDSEN, in his official capacity as
Attorney General for the State of
Montana,**

Defendants.

Case No. 21-cv-00047-SPW-KLD

**DEFENDANT NORTHWESTERN
CORPORATION'S MOTION TO
COMPEL ARBITRATION AND
APPOINT A MAGISTRATE
JUDGE TO OVERSEE
ARBITRATION PROCEDURE
NEGOTIATIONS**

L.R. 7.1(c)(1) STATEMENT

NorthWestern Corporation (“NorthWestern”) contacted counsel for Plaintiffs and Talen Montana, LLC (“Talen”). Plaintiffs and Talen do not yet have a position on the motion and they reserve the right to object after reviewing it.

NorthWestern also informed Defendant Montana Attorney General Austin Knudsen (“State”), about the motion, which is not directed to the State. The State has not responded to NorthWestern’s inquiry.

MOTION

Pursuant to 9 U.S.C. § 4, NorthWestern respectfully moves this Court for an order compelling the parties to move forward promptly with arbitration and further appointing a magistrate judge to oversee negotiations ensuring that they will.

This motion is supported by the concurrently filed Brief in Support of Motion to Compel Arbitration, by the concurrently filed declarations of John K. Tabaracci and J David Jackson in support of this motion, and by the record in this matter.

DATED: December 3, 2021

Respectfully submitted,

DORSEY & WHITNEY LLP

By: /s/ J Jackson
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