Charles E. Hansberry
Jenny M. Jourdonnais
HANSBERRY & JOURDONNAIS, PLLC
2315 McDonald Avenue, Suite 210
Missoula, MT 59801
chuck@hjbusinesslaw.com
jenny@hjbusinesslaw.com
Phone: 406-203-1730

Phone: 406-203-1730 Fax: 406-205-3170

Attorneys for Plaintiffs

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.,

Case No. 1:21-cv-00047-BLG-SPW-KLD

Plaintiffs.

JOINT STATUS REPORT RE: TALEN BANKRUPTCY

V.

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

Defendants.

Plaintiffs Portland General Electric Company, Avista Corporation,
PacifiCorp, and Puget Sound Energy, Inc. (collectively, the "PNW Owners"), and
Defendants Talen Montana, LLC ("Talen"), NorthWestern Corporation

("NorthWestern"), and Austin Knudsen pursuant to the Court's Minute Order of
June 1, 2022, provide the following status report regarding *In re: Talen Energy*

Supply, LLC, et al., Case No. 22-90054 (Bankr. S.D. Texas):

- 1. On May 18, 2022, the PNW Owners filed a Motion for Relief from the Automatic Stay to allow this case and the arbitration relating to the Ownership & Operation Agreement to proceed. On May 27, 2022, NorthWestern joined in the motion.
- 2. On June 3, 2022, Talen Montana, LLC ("Talen") filed its objection to the PNW Owners' and NorthWestern's motion.
- 3. On June 10, 2022, the Bankruptcy Court held a hearing on the motion and, after hearing argument from the parties, continued the hearing until July 12, 2022. The Bankruptcy Court also ordered additional briefing on issues it raised at the hearing. Movants filed their supplemental briefs on June 20, 2022, and Talen's supplemental brief in response is due on July 1, 2022.
- 4. Given this most recent scheduling, the parties do not expect a decision from the Bankruptcy Court on the PNW Owners' and NorthWestern's motion to lift stay until on or after July 12, 2022.

Dated this 23rd day of June, 2022.

/c/ Charles E. Hansberry

HANSBERRY & JOURDONNAIS, PLLC Charles E. Hansberry Jenny M. Jourdonnais Attorneys for Plaintiffs

Dated this 23rd day of June, 2022.

/s/ Robert Sterup

Robert Sterup Brown Law Firm Attorneys For Talen Montana, LLC

Dated this 23rd day of June, 2022.

/s/ J. Jackson

J. Jackson Dorsey Law Firm Attorneys For NorthWestern Corp.

Dated this 23rd day of June, 2022.

/s/ Timothy Longfield

Timothy Longfield Office of Attorney General