

David M.S. Dewhirst (MT Bar #65934132)
Office of the Attorney General, State of
Montana
215 North Sanders
P.O. Box 201401
Helena, MT 59620-1401
Telephone: (406) 444-2026

Austin Markus James (MT Bar #58422031)
Office of the Secretary of State, State of
Montana
Montana Capitol Building, Room 260
P.O. Box 202801
Helena, MT 59620-2801
Telephone: (406) 444-6197

*Attorneys for Defendant Christi Jacobsen, in her
official capacity as Montana Secretary of State*

CLERK OF THE
DISTRICT COURT
Dale Schowengerdt (MT Bar #30842848)
David F. Knobel (MT Bar #212614)
CROWLEY FLECK PLLP
900 North Last Chance Gulch, Suite 200
Helena, MT 59601
P.O. Box 797
Helena, MT 59624-0797
Main: 406.449.4165 DEPUTY
Direct: 406.457.2040

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IN THE MONTANA THIRTEENTH JUDICIAL DISTRICT COURT,
YELLOWSTONE COUNTY

Montana Democratic Party and Mitch Bohn, Plaintiffs, vs. Christi Jacobsen, in her official capacity as Montana Secretary of State, Defendant.	Cause No.: DV 21-0451 Judge: Michael Moses DEFENDANT'S MOTION FOR PROTECTIVE ORDER TO STAY DISCOVERY PURSUANT TO RULE 26(C)(1)
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Defendant Christi Jacobsen, in her official capacity as Montana Secretary of State, ("Defendant" of "Jacobsen") moves the Court for a Protective Order under Rule 26(c) to stay discovery until the Court has resolved Defendant's pending motion to dismiss. Should the Court

deny this motion, Secretary Jacobsen would request the Court provide it with a reasonable time to respond to Plaintiffs' discovery requests following the entry of the Court's decision.

Counsel for Secretary Jacobsen has contacted and conferred with counsel for Plaintiffs regarding this motion and the relief requested, and counsel for Plaintiffs has indicated that Plaintiffs oppose this motion.

This motion is supported by the accompanying brief in support.

DATED this 13th day of August, 2021.

By Dale Schowengerdt
Dale Schowengerdt
CROWLEY FLECK PLLP
P.O. Box 797
Helena, MT 59624-0797

By David M.S. Dewhirst
David M.S. Dewhirst
P.O. Box 201401
Helena, MT 59620-1401

By Austin Markus James
Austin Markus James
P.O. Box 202801
Helena, MT 59620-2801

*Attorneys for Defendant Christi Jacobsen, in her
official capacity as Montana Secretary of State*

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of August, 2021, I mailed a true and correct copy of the foregoing document, by the means designated below, to the following:

U.S. Mail Peter M. Meloy
 Electronic mail P.O. Box 1241
 Facsimile Helena, MT 59624
 Hand delivery mike@meloylawfirm.com
 Certified mail, return receipt

U.S. Mail Matthew Gordon
 Electronic mail Perkins Coie LLP
 Facsimile 1201 Third Avenue, Ste 4900
 Hand delivery Seattle, WA 98101-3099
 Certified mail, return receipt mgordon@perkinscoie.com

U.S. Mail John Heenan
 Electronic mail Heenan & Cook PLLC
 Facsimile 1631 Zimmerman Trail
 Hand delivery Billings, MT 59102
 Certified mail, return receipt john@lawmontana.com

David F. David F. Knobel
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By Knobel 06:08-06'00'