RYLEE SOMMERS-FLANAGAN Upper Seven Law

P.O. Box 31

Helena, MT 59624

Phone: (406) 396-3373

Email: rylee@uppersevenlaw.com

no

CLERK OF THE DISTRICT COURT TERRY HALPIN

2021 NOV -9 A 10: 21

FILED

BY______ DEPUTY

Attorney for Plaintiffs

MONTANA THIRTEENTH JUDICIAL DISTRICT COURT, YELLOWSTONE COUNTY

Montana Youth Action; Forward Montana Foundation; and Montana Public Interest Research Group,

Plaintiffs,

vs.

CHRISTI JACOBSEN, in her official capacity as Montana Secretary of State,

Defendant.

Cause Nos. DV 21-0451 DV 21-1097

Hon. Michael Moses Hon. Gregory R. Todd

Plaintiffs' Motion for Consolidation

For the reasons given in the accompanying Brief in Support of the Motion, Plaintiffs Montana Youth Action, Forward Montana Foundation, and Montana Public Interest Research Group hereby move the Court for consolidation of Cause No. DV 21-0451 and Cause No. DV 21-1097 before

the department having the lowest cause number, pursuant to Thirteenth

Judicial District Local Rule 1(h).

Plaintiffs' counsel contacted opposing counsel, who confirmed that the Secretary opposes this motion.

Respectfully submitted this 9th day of November, 2021.

Rylee Sommers-Flanagan

Upper Seven Law

Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the above was duly served upon the following on the 9th day of November, 2021, by email.

David M.S. Dewhirst
Office of the Attorney General
Justice Building, Third Floor
215 North Sanders Street
P.O. Box 201401
Helena, MT 59620-1401
david.Dewhirst@mt.gov

Austin Marcus James
Office of the Secretary of State
Montana Capitol Building, Room 260
P.O. Box 202801
Helena, MT 59620-2801
austin.james@mt.gov

Dale Schowengerdt
Ian McIntosh
Crowley Fleck, PLLP
900 North Last Chance Gulch, Suite 200
Helena, MT 59601
P.O. Box 797
Helena, MT 59624-0797
DSchowengerdt@crowleyfleck.com
imcintosh@crowleyfleck.com

/s/ Rylee Sommers-Flanagan
Upper Seven Law