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DISTRICT COURT
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**Pro Hac Vice forthcoming*

MONTANA THIRTEENTH JUDICIAL DISTRICT COURT
COUNTY OF YELLOWSTONE

WESTERN NATIVE VOICE, Montana)	
Native Vote, Blackfeet Nation, Confederated)	
Salish and Kootenai Tribes, Fort Belknap)	Cause No. DV 21-0560
Indian Community, and Northern Cheyenne)	
Tribe,)	Hon. Ashley Harada
)	
Plaintiffs,)	
vs.)	PLAINTIFFS' MOTION FOR
)	CONSOLIDATION
CHRISTI JACOBSEN, in her official)	
capacity as Montana Secretary of State,)	
)	
Defendant.)	

COME NOW, the Plaintiffs, by and through counsel of record, and hereby file and serve their Motion for Consolidation. Plaintiffs in the instant action seek consolidation with the pending case of *Montana Democratic Party et al. v. Jacobsen*, Cause No. DV 21-0451 (Thirteenth Judicial District Court, Hon. Michael Moses) (hereinafter "*MDP*"). Pursuant to Rule 1(h) of the Thirteenth Judicial District local rules, this motion is being filed concurrently in Cause No. DV 21-0451 and Cause No. DV 21-0560.¹ Counsel for Plaintiffs in *MDP* have been contacted and do not object to this Motion. Counsel for Defendant in *MDP* have been contacted and object to this Motion as premature.

This Motion is supported by the concurrently-filed brief. A proposed order is attached.

DATED THIS 24th day of June, 2021.



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¹ The motion "will be heard before the judge presiding in the lowest cause number and, if the cases are consolidated, the trial will also be conducted in that department. The judges may consult with each other regarding any decision on a motion to consolidate." Rule 1(h), Thirteenth Judicial District Local Rules.

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I, Alex Rate, hereby certify on this date I emailed a true and accurate copy of the foregoing document to:

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DATED: June 24, 2021

Alex Rate
Alex Rate

Robyn Schierholt

From: Krystal Pickens <krystelp@aclumontana.org>
Sent: Thursday, June 24, 2021 7:49 AM
To: DC_CaseFilingsShared
Cc: Alex Rate
Subject: DV-56-2021-0000560-DK - Western Native Voice vs. Jacobsen, Christi As Secretary Of State Of MT; Motion for Consolidation
Attachments: 2021-06-24 Motion for Consolidation (Harada).pdf; 2021-06-24 WNV v. Jacobsen - Proposed Order (Harada).docx; 2021-06-24 WNV v. Jacobsen - Proposed Order (Harada).pdf; 2021-06-24 WNV. Jacobsen BIS of Motion.pdf

Dear Clerk of District Court:

Attached for filing, please find the Plaintiffs' motion for consolidation, brief in support, and a proposed order (word and pdf formats). Please note that I am filing similar documents in the parallel case (Cause No. DV 21-0451 - Montana Democratic Party and Mitch Bohn) momentarily. If possible, please send the invoice(s) to me and I'll pay the filing fees promptly. If you have any questions, you may reach me at 406.396.8222.

Lastly, I did mail a notice of filing, the original return of service/proof of service, and the original summons yesterday. Thank you for your assistance!

Best,
Krystal

Krystal Pickens | Paralegal
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