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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION**

MONTANA DEMOCRATIC PARTY,
MONTANANS FOR TESTER, MACEE
PATRITTI

Plaintiffs,

v.

CHRISTI JACOBSEN, in her official
capacity as the Montana Secretary of State,
JEFFREY MANGAN, in his official
capacity as Montana Commissioner of
Political Practices,

CV-21-119-M-DWM

Defendants.

JOINT MOTION FOR STAY OF PROCEEDINGS

Plaintiffs and Defendants jointly move this Court for an order staying this matter until May 20, 2022 and continuing all current deadlines pending certain ongoing proceedings in the matter of *Forward Montana v. Montana*, Case No. ADV-2021-611, in Montana First Judicial District Lewis and Clark County. On February 3, 2022 that court granted plaintiffs' partial motion for summary judgment enjoining, among other things, Section 21 of SB 319, the provision of law at issue here (*see* Ex. A). In that matter, the State Defendants have made an unopposed motion to certify that partial judgement as final under Montana Rule of Civil Procedure Rule 54(b). That motion is pending in the district court. Defendants have now informed Plaintiffs that the State Defendants do not intend to appeal that ruling once it becomes final, leaving in place a permanent injunction of the law at issue here.

Accordingly, the parties jointly request this stay to allow the Montana First Judicial District Court to consider the motion making the summary judgment determination in that matter final. Should it grant the motion, making the permanent injunction of the law at issue here final, the parties are engaged in discussions about an appropriate agreement for a potential resolution of this matter.

Given these events, a stay in this matter and a continuation of the current

deadlines is in the interest of conserving the resources of this Court and the parties. The parties would intend to provide this Court with an update on the current status of the proceedings in state court and their discussions on or before May 20, 2022. A proposed Order reflecting this is attached hereto as Exhibit B.

Dated: May 5, 2022

Respectfully submitted,

/s/ Peter Michael Meloy

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 5, 2022, I electronically served the foregoing via the CM/ECF system which will generate a Notice of Electronic Filing on all counsel of record.

/s/ Peter Michael Meloy