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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
HELENA DIVISION

MONTANA GREEN PARTY,
DANIELLE BRECK, CHERYL
WOLFE, HARRY C. HOVING,
DOUG CAMPBELL, STEVE KELLY,
ANTONIO MORSETTE TAMARA R.
THOMPSON, and ADRIEN OWEN
WAGNER,

Plaintiffs,

v.

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

Defendant.

CV-18-00087-H-BMM-JTJ

**JOINT MOTION FOR ENTRY
OF CONSENT JUDGMENT**

The Plaintiffs and Defendant, in her official capacity as Secretary of State for the State of Montana, by their respective counsel, move that the Court approve and enter the proposed consent judgment attached hereto as Exhibit "A". As grounds for this motion, the parties state:

1. The aforesaid proposed consent judgment has been discussed and negotiated among the parties and their counsel considering the decision of the U.S. Court of Appeals for the Ninth Circuit in *Montana Green Party v. Jacobsen*, 17 F.4th 919 (9th Cir. 2021).
2. The proposed consent judgment represents a fair, adequate, and reasonable resolution of all issues in this action that will benefit all parties while serving the public interest.
3. Therefore, Counsel for the parties have conferred with each other and the Plaintiffs and Defendant and jointly ask this Court to grant the relief requested in this motion.

Dated this 1st day of March, 2022.

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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document with the clerk of the court for the United States District Court for the District of Montana, using cm/ecf system.

Participants in the case who are registered cm/ecf users will be served by the cm/ecf system.

Dated: March 1, 2022

/s/ James C. Linger