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MONTANA THIRTEENTH JUDICIAL DISTRICT COURT
COUNTY OF YELLOWSTONE

| | | |
|---|---|----------------------------------|
| WESTERN NATIVE VOICE, Montana |) | Consolidated Case No. DV 21-0451 |
| Native Vote, Blackfeet Nation, Confederated |) | |
| Salish and Kootenai Tribes, Fort Belknap |) | Hon. Michael G. Moses |
| Indian Community, and Northern Cheyenne |) | |
| Tribe, |) | PLAINTIFFS' MOTION FOR |
| Plaintiffs, |) | PRELIMINARY INJUNCTION |
| |) | |
| v. |) | |
| |) | |
| Christi Jacobsen, in her official capacity as |) | |
| Montana Secretary of State, |) | |
| |) | |
| Defendant. |) | |
| |) | |
| |) | |

Pursuant to § 27-19-301, MCA, Mont. Uniform D. Ct. Rule 2, and L.R. 5, Plaintiffs apply for a preliminary injunction to prevent the enforcement of House Bill 176 (“HB 176”) and House Bill 530 (“HB 530”), pending resolution of their claims that these statutes violate their constitutional rights. HB 176 ends the practice of Election Day voter registration (“EDR”) by revising §§ 13-2-301, 13-2-304, 13-13-301, 13-19-207, and 13-21-104, MCA. HB 530 (an undesignated enactment) inhibits the collection or conveyance of absentee ballots. Plaintiffs concurrently file their memorandum in support of this motion for a preliminary injunction with supporting affidavits and exhibits.

Undersigned counsel provided notice of this application to Defendant, on January 12, 2022 and duly served this application.

DATED THIS 12th day of January, 2022.

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/s/ Alex Rate

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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: January 12, 2022

/s/ Alex Rate
Alex Rate

CERTIFICATE OF SERVICE

I, Alexander H. Rate, hereby certify that I have served true and accurate copies of the foregoing Motion - Motion to the following on 01-12-2022:

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