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*Attorneys for Plaintiffs Montana Democratic Party and Mitch Bohn*

**IN THE MONTANA THIRTEENTH JUDICIAL DISTRICT COURT  
YELLOWSTONE COUNTY**

Montana Democratic Party, Mitch Bohn,  
Plaintiffs,

Western Native Voice, Montana Native Vote,  
Blackfeet Nation, Confederated Salish and  
Kootenai Tribes, Fort Belknap Indian  
Community, and Northern Cheyenne Tribe,  
Plaintiffs,

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

v.

Christi Jacobsen, in her official capacity as  
Montana Secretary of State,  
Defendant.

Consolidated Case No. DV 21-0451

**MONTANA DEMOCRATIC PARTY  
AND MITCH BOHN'S MOTION  
FOR PRELIMINARY INJUNCTION**

Come now Plaintiffs, the Montana Democratic Party and Mitch Bohn, in this consolidated matter and move this court for the issuance of a preliminary injunction restraining the Defendant and her agents, officers, employees, successors, and all persons acting in concert with each or any of them from enforcing the provisions of the three laws challenged in Plaintiffs' First Amended Complaint pending resolution of the matters alleged in the Complaint. Specifically, Plaintiffs seek to enjoin (1) the changes House Bill 176 (2021) made to § 13-2-304(1)(a), MCA; (2) the changes Senate Bill 169 (2021) made to § 13-13-114(1)(a), MCA; and (3) the changes House Bill 530 (2021) made in § 2021 Montana Laws Ch. 534, Sec. 2 (H.B. 530). This Motion is based upon the grounds and for the reasons more fully set forth in the Memorandum of Points and Authorities and supporting evidence submitted together, herewith.

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Dated: January 12, 2022

Respectfully submitted,

By: /s/ Peter Michael Meloy

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## CERTIFICATE OF SERVICE

I, Matthew Prairie Gordon, hereby certify that I have served true and accurate copies of the foregoing Motion - Motion to the following on 01-13-2022:

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Electronically Signed By: Matthew Prairie Gordon  
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