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Attorneys for Plaintiffs

**IN THE MONTANA FIRST JUDICIAL DISTRICT COURT
LEWIS AND CLARK COUNTY**

FORWARD MONTANA; LEO
GALLAGHER; MONTANA
ASSOCIATION OF CRIMINAL
DEFENSE LAWYERS; GARY
ZADICK,

Plaintiffs,

vs.

THE STATE OF MONTANA, by and
through GREG GIANFORTE,
Governor,

Defendant.

Cause No. ADV-2021-611

**PLAINTIFFS' MOTION
FOR PROTECTIVE ORDER
TO STAY DISCOVERY
PURSUANT TO RULE 26(c)(1)**

Plaintiffs Forward Montana, Leo Gallagher, Montana Association of Criminal Defense Lawyers (MACDL), and Gary Zadick move the Court for a Protective under Rule 26(c) to bar the State from seeking depositions from Plaintiffs until the Court has resolved Plaintiffs' motion for summary judgment.

Plaintiffs' counsel has met and conferred with counsel for the State regarding its request for discovery and the present motion. The State opposes the motion.

A brief in support accompanies this motion.

Respectfully submitted this 29th day of October, 2021.

/s/ Raphael Graybill

Raphael J.C. Graybill
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/s/ Rylee Sommers-Flanagan

Rylee K. Sommers-Flanagan
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the above was duly served upon the following on the 29th day of October, 2021, by email.

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