AUSTIN KNUDSEN Attorney General CHRISTIAN B. CORRIGAN Solicitor General Montana Department of Helena, MT 59601 **Justice** 215 N. Sanders Helena, MT 59601 (406) 444-2026 christian.corrigan@mt.gov

Dale Schowengerdt Landmark Law PLLC 7 West 6th Avenue, Suite 518 (406) 457-5496 dale@landmarklawpllc.com Thomas R. McCarthy* Kathleen S. Lane Conor D. Woodfin* Consovoy McCarthy PLLC 1600 Wilson Blvd., Ste. 700 Arlington, VA 22209 (703) 243-9423 tom@consovoymccarthy.com katie@consovoymccarthy.com conor@consovoymccarthy.com

*admitted pro hac vice

*additional counsel listed in signature block

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA HELENA DIVISION

MONTANA PUBLIC INTEREST RESEARCH GROUP and MONTANA FEDERATION OF PUBLIC EMPLOYEES,

Plaintiffs,

v.

CHRISTI JACOBSEN, in her official capacity as Montana Secretary of State, AUSTIN KNUDSEN, in his official capacity as Montana Attorney General, and CHRIS GALLUS, in his official capacity as Montana Commissioner of Political Practices,

Defendants,

REPUBLICAN NATIONAL COMMITTEE and MONTANA REPUBLICAN PARTY,

Intervenor-Defendants.

No. 6:23-cy-070-BMM

UNOPPOSED JOINT MOTION TO EXPEDITE **CONSIDERATION OF** MOTION TO STAY INJUNCTION PENDING APPEAL

This case involves a constitutional challenge to HB 892's multiple-registration

prohibition and prior-registration disclosure requirement, which are codified in

Montana Code Annotated §13-35-210(5). On April 24, 2024, this Court preliminarily

enjoined the challenged law. On May 1, 2024, Defendants and Intervenor-Defendants

appealed the injunction and simultaneously moved for emergency relief to stay the

injunction pending appeal in this Court, noting that they sought expedited consideration

of the motion. Doc. 83.

Given the looming deadline of the June 4 primary, and the close of late voter

registration in Montana, Defendants and Intervenor-Defendants respectfully request

expedited consideration of the pending motion to stay (Doc. 83) and a decision from

this Court by Thursday, May 16, 2024, so they can move for relief in the Ninth Circuit

if necessary. Plaintiffs' response is due this Wednesday, May 15, and Defendants and

Intervenor-Defendants waive their reply in support of the motion to stay.

Plaintiffs do not oppose this motion.

DATED this 13th day of May, 2024

Respectfully submitted,

AUSTIN KNUDSEN Attorney General of Montana

/s/ Christian B. Corrigan
CHRISTIAN B. CORRIGAN
Solicitor General
MICHAEL RUSSELL

THANE JOHNSON

2

ALWYN LANSING
MICHAEL NOONAN
Assistant Attorneys General
Montana Department of Justice
215 N. Sanders Helena, MT 59601
(406) 444-2026
christian.corrigan@mt.gov
michael.russell@mt.gov
thane.johnson@mt.gov
alwyn.lansing@mt.gov
michael.noonan@mt.gov

Attorneys for Defendants

/s/ Kathleen S. Lane
KATHLEEN S. LANE
THOMAS R. McCarthy*
CONOR D. WOODFIN*
Consovoy McCarthy PLLC
1690 Wilson Blvd., Ste. 700
Arlington, VA 22209
(703) 243-9423
tom@consovoymccarthy.com
katie@consovoymccarthy.com
conor@consovoymccarthy.com

DALE SCHOWENGERDT Landmark Law PLLC 7 West 6th Avenue, Suite 518 Helena, MT 59601 (406) 457-5496 dale@landmarklawpllc.com

*admitted pro hac vice

Attorneys the Republican National Committee and the Montana Republican Party

CERTIFICATE OF SERVICE

I certify that on May 13, 2024, an accurate copy of the foregoing notice was served electronically through the Court's CM/ECF system on registered counsel.

/s/ Kathleen S. Lane

RELIBIENED FROM DEINOCRACYDOCKET. COM