

Raph Graybill
Graybill Law Firm, PC
300 4th Street North
PO Box 3586
Great Falls, MT 59403
(406) 452-8566
raph@graybilllawfirm.com

Katie Chamblee-Ryan*
Marcos Mocine-McQueen*
Marisa A. O’Gara*
ELIAS LAW GROUP LLP
250 Massachusetts Ave NW, Suite 400
Washington, DC 20001
kchambleeryan@elias.law
mmcqueen@elias.law
mogara@elias.law

Attorneys for Plaintiff
**Admitted Pro Hac Vice*

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

Montana Federation of Public Employees,
Plaintiff,

v.

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

Case No. DV-25-268

**PLAINTIFF’S MOTION FOR
PARTIAL SUMMARY JUDGMENT
AND APPLICATION FOR
PRELIMINARY INJUNCTION**

RETRIEVED FROM DEMOCRACYDOCKET.COM

Plaintiff Montana Federation of Public Employees respectfully moves this Court for partial summary judgment pursuant to Montana Rule of Civil Procedure 56(c)(3). Summary judgment is appropriate because there are no genuine issues of material fact, and Plaintiff is entitled to judgment as a matter of law. Plaintiff respectfully requests oral argument on its motion.

Plaintiff specifically requests that the Court enter summary judgment in its favor on Count I of its Complaint. The factual and legal bases for Plaintiff's Motion for Summary Judgment are set out in detail in Plaintiff's Brief in Support of Plaintiff's Motion for Summary Judgment, which is filed concurrently with this Motion.

In the alternative, Plaintiff respectfully moves this Court for a preliminary injunction on Count I under 27-19-201(1), MCA, in light of the upcoming June 2026 statewide primary election.

Plaintiff has contacted counsel for Defendants, and Defendants oppose Plaintiff's Motion for Summary Judgment and Application for Preliminary Injunction.

Dated: January 22, 2026

Respectfully submitted,

By: /s/ Raph Graybill
Raph Graybill
Graybill Law Firm, PC
300 4th Street North
PO Box 3586
Great Falls, MT 59403
(406) 452-8566
raph@graybilllawfirm.com

Katie Chamblee-Ryan*
Marcos Mocine-McQueen*
Marisa A. O'Gara*
ELIAS LAW GROUP LLP
250 Massachusetts Ave NW, Suite 400
Washington, DC 20001
kchambleeryan@elias.law
mmcqueen@elias.law

mogara@elias.law

Attorneys for Plaintiff
**Admitted Pro Hac Vice*

RETRIEVED FROM DEMOCRACYDOCKET.COM

CERTIFICATE OF SERVICE

I, Raphael Jeffrey Carlisle Graybill, hereby certify that I have served true and accurate copies of the foregoing Motion - Motion for Summary Judgment (Non Government) to the following on 01-22-2026:

Molly Elizabeth Danahy (Attorney)
P.O Box 31
Helena MT 59624
Representing: Forward Montana
Service Method: eService

Rylee Sommers-Flanagan (Attorney)
P.O. Box 31
Helena MT 59624
Representing: Forward Montana
Service Method: eService

Alexander H. Rate (Attorney)
P.O. Box 1968
Missoula MT 59806
Representing: Fort Belknap Indian Community, Western Native Voice, Blackfeet Nation,
Confederated Salish And Kootenai Tribes, Northern Cheyenne Tribe
Service Method: eService

Ashlee Nichole Rossler (Attorney)
P.O. Box 1968
Missoula MT 59806
Representing: Fort Belknap Indian Community, Western Native Voice, Blackfeet Nation,
Confederated Salish And Kootenai Tribes, Northern Cheyenne Tribe
Service Method: eService

Austin Miles Knudsen (Govt Attorney)
215 N. Sanders
Helena MT 59620
Representing: State of Montana, Montana Secretary of State
Service Method: eService

Michael D. Russell (Govt Attorney)
215 N Sanders
Helena MT 59620

Representing: State of Montana, Montana Secretary of State
Service Method: eService

Thane P. Johnson (Govt Attorney)

215 N SANDERS ST

P.O. Box 201401

HELENA MT 59620-1401

Representing: State of Montana, Montana Secretary of State

Service Method: eService

Michael Noonan (Govt Attorney)

215 N SANDERS ST

HELENA MT 59601-4522

Representing: State of Montana, Montana Secretary of State

Service Method: eService

Alwyn T. Lansing (Govt Attorney)

215 N. Sanders St.

Helena MT 59620

Representing: State of Montana

Service Method: eService

Justin Oliveira (Attorney)

115 N. Broadway, Suite 410

Billings MT 59101

Representing: Montana Republican State Central Committee

Service Method: eService

Emily Jones (Attorney)

115 North Broadway

Suite 410

Billings MT 59101

Representing: Montana Republican State Central Committee

Service Method: eService

Timothy Longfield (Attorney)

7 West 6th Avenue

Helena MT 59601

Representing: Republican National Committee

Service Method: eService

Dale Schowengerdt (Attorney)

7 West 6th Avenue, Suite 518

Helena MT 59601

Representing: Republican National Committee

Service Method: eService

Montana Public Interest Research Group (Other Party)

Service Method: Email

Allison A. Neswood (Attorney)

250 Arapahoe Avenue

Boulder CO 80302

Representing: Fort Belknap Indian Community, Western Native Voice, Blackfeet Nation, Confederated Salish And Kootenai Tribes, Northern Cheyenne Tribe

Service Method: Email

Jacqueline De Leon (Attorney)

250 Arapahoe Avenue

Boulder CO 80302

Representing: Fort Belknap Indian Community, Western Native Voice, Blackfeet Nation, Confederated Salish And Kootenai Tribes, Northern Cheyenne Tribe

Service Method: Email

Theresa J. Lee (Attorney)

125 Broad Street, 18th Floor

New York NY 10004

Representing: Fort Belknap Indian Community, Western Native Voice, Blackfeet Nation, Confederated Salish And Kootenai Tribes, Northern Cheyenne Tribe

Service Method: Email

Alwyn T. Lansing (Attorney)

P. O. Box 201401

Helena MT 596201401

Representing: Montana Secretary of State

Service Method: Email

Marcos Mocine-McQueen (Attorney)

250 Massachusetts Avenue NW Suite 400

Washington DC 20001

Representing: Montana Federation of Public Employees

Service Method: Email

Katherine Chamblee-Ryan (Attorney)

250 Massachusetts Avenue NW Suite 400

Washington DC 20001

Representing: Montana Federation of Public Employees

Service Method: Email

Marisa O'Gara (Attorney)

250 Massachusetts Avenue NW Suite 400

Washington DC 20001

Representing: Montana Federation of Public Employees

Service Method: Email

Electronically signed by Emma Edwards on behalf of Raphael Jeffrey Carlisle Graybill
Dated: 01-22-2026

RETRIEVED FROM DEMOCRACYDOCKET.COM