Raph Graybill

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

Abha Khanna*
Elias Law Group LLP
1700 Seventh Avenue, Suite 2100
Seattle, WA 98101
(206) 656-0177
akhanna@elias.law

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

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

MONTANA PUBLIC INTEREST RESEARCH GROUP,

Plaintiff.

V.

STATE OF MONTANA and CHRISTI JACOBSEN, in her official capacity as Montana Secretary of State,

Defendants.

9:25-cv-00082-KLD

MOTION TO REMAND

Plaintiff respectfully moves this court to remand the above captioned case to the Montana Fourth Judicial District Court, Missoula County pursuant to 28 U.S.C.

^{*}Motions for Admission Pro Hac Vice Forthcoming

§ 1447(c). The basis for this motion is fully set forth in the accompanying Brief in Support of Motion to Remand.

Counsel for Plaintiff contacted counsel for Defendants. Defendants oppose.

Dated: June 24, 2025

Respectfully submitted,

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

Abha Khanna*
Elias Law Group LLP
1700 Seventh Avenue, Suite 2100
Seattle, Washington 98101
(206) 656-0177
akhanna@elias.law

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
*Motions for Pro Hac Vice Forthcoming

CERTIFICATE OF SERVICE

I, Raph Graybill, hereby certify that on the 24th day of June, 2025, I electronically filed the foregoing brief with the Clerk of the Court of the United States District Court for the District of Montana by using the CM/ECF system. Participants in the case who are registered CM/ECF users have been served by the CM/ECF system.

/s/ Raph Graybill
Raph Graybill
Raph Graybill
Raph Graybill
Raph Graybill
Raph Graybill