Austin Knudsen
Montana Attorney General
Thane Johnson
Michael D. Russell
Alwyn Lansing
Assistant Attorneys General
MONTANA DEPARTMENT OF JUSTICE
PO Box 201401
Helena, MT 59620-1401
Phone: 406-444-2026
thane.johnson@mt.gov
michael.russell@mt.gov
alwyn.lansing@mt.gov

Emily Jones
Special Assistant Attorney General
JONES LAW FIRM, PLLC
115 N. Broadway, Suite 410
Billings, MT 59101
Phone: 406-384-7990
emily@joneslawmt.com
Attorneys for Defendants

MONTANA FIRST JUDICIAL DISTRICT COURT, LEWIS AND CLARK COUNTY

PLANNED PARENTHOOD OF MONTANA, et al., Plaintiffs, v. STATE OF MONTANA, by and through AUSTIN KNUDSEN, in his official capacity as Attorney General, et al., Defendants.	Cause No.: ADV-2023-231 Honorable Mike Menahan **DEFENDANTS' MONT. R. CIV. P. 11 MOTION FOR SANCTIONS**

Pursuant to Mont. R. Civ. P. 11, Defendants respectfully move this Court for sanctions against Plaintiffs and their attorneys. Plaintiffs have violated Rule 11(b) by (1) filing a frivolous complaint and request for a temporary restraining order that lacks merit, (2) filing this lawsuit and

request for improper purposes, and (3) misrepresenting the appropriate standard of proof for a temporary restraining order and preliminary injunction to issue.

Pursuant to Rule 11, Defendants request that the Court Order:

I. Plaintiffs to pay the costs and reasonable attorneys' fees incurred by the State of Montana for bringing this Motion and defending itself against this frivolous lawsuit;

II. That Plaintiffs' attorneys' "Forthcoming" Motions for pro hac vice Admission be denied for failing to follow Montana Rules of Civil Procedure, Montana Rules of Professional Conduct, and other applicable laws in bringing this lawsuit;

III. That Plaintiffs' local counsel, Raphael Graybill, be ordered to attend Continuing Legal Education courses through the State Bar of Montana on ethics in litigation;

IV. Any other relief the Court deems proper to deter repetition of Plaintiffs' improper conduct.

Pursuant to Mont. R. Civ. P. 11(b)(2), Defendants served this Motion and the supporting Brief on Plaintiffs and their counsel under Rule 5 on April 14, 2023, but waited the requisite 21 days after such service to file the Motion.

DATED this 8th day of May, 2023.

Austin Knudsen
MONTANA ATTORNEY GENERAL

Thane Johnson
Michael D. Russell
Alwyn Lansing
Assistant Attorneys General
PO Box 201401
Helena, MT 59620-1401

Emily Jones
Special Assistant Attorney General
JONES LAW FIRM, PLLC
115 N. Broadway, Suite 410
Billings, MT 59101

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I, Austin Miles Knudsen, hereby certify that I have served true and accurate copies of the foregoing Motion - Motion to the following on 05-08-2023:

Raphael Jeffrey Carlisle Graybill (Attorney)
300 4th Street North
PO Box 3586
Great Falls MT 59403
Representing: Samuel Dickman, Planned Parenthood Of Montana
Service Method: eService

Emily Jones (Attorney)
115 North Broadway
Suite 410
Billings MT 59101
Representing: Montana DPHHS, Austin Knudsen, State of Montana, Charlie Brereton
Service Method: eService

Michael D. Russell (Govt Attorney)
215 N Sanders
Helena MT 59620
Representing: Montana DPHHS, Austin Knudsen, State of Montana, Charlie Brereton
Service Method: eService

Alwyn T. Lansing (Govt Attorney)
215 N. Sanders St.
Helena MT 59620
Representing: Montana DPHHS, Austin Knudsen, State of Montana, Charlie Brereton
Service Method: eService

Thane P. Johnson (Govt Attorney)
215 N SANDERS ST
P.O. Box 201401
HELENA MT 59620-1401
Representing: Montana DPHHS, Austin Knudsen, State of Montana, Charlie Brereton
Service Method: eService

Electronically signed by Dia Lang on behalf of Austin Miles Knudsen
Dated: 05-08-2023

Austin Knudsen
Montana Attorney General
Thane Johnson
Michael D. Russell
Alwyn Lansing
Assistant Attorneys General
MONTANA DEPARTMENT OF JUSTICE
PO Box 201401
Helena, MT 59620-1401
Phone: 406-444-2026
thane.johnson@mt.gov
michael.russell@mt.gov
alwyn.lansing@mt.gov

Emily Jones
Special Assistant Attorney General
JONES LAW FIRM, PLLC
115 N. Broadway, Suite 410
Billings, MT 59101
Phone: 406-384-7990
emily@joneslawmt.com
Attorneys for Defendants

MONTANA FIRST JUDICIAL DISTRICT COURT, LEWIS AND CLARK COUNTY

PLANNED PARENTHOOD OF MONTANA, et al., Plaintiffs, v. STATE OF MONTANA, by and through AUSTIN KNUDSEN, et al., Defendants.	Cause No.: ADV 2023–231 Honorable Mike Menahan **DEFENDANTS' BRIEF IN SUPPORT OF MOTION FOR MONT. R. CIV. P. 11 SANCTIONS**

INTRODUCTION

By filing a Complaint challenging House Bill ("HB") 721 before it has become law, Plaintiffs knowingly filed a premature lawsuit that had no reasonable basis in law or fact for the improper purposes of influencing the legislative process and executing a public relations stunt. Additionally, Plaintiffs misstated the applicable preliminary injunction standard to this Court,

improperly attempting to shift the burden of proof to Defendants to obtain a Temporary Restraining Order and Preliminary Injunction. Because this suit was blatantly premature, as Judge Seeley immediately recognized, and therefore obviously filed for improper purposes, Rule 11 sanctions are appropriate.

FACTUAL AND PROCEDURAL BACKGROUND

Plaintiffs filed this lawsuit challenging HB 721 on April 10, 2023. (Doc. 1.) HB 721 was passed by the Legislature on April 7, 2023, and is in the "Enrolling and Final Preparation Process." *See* Montana Legislative Branch, Detailed Bill Information, Current Bill Progress, HB 721, available at https://tinyurl.com/mu3e7hhv. The bill has not yet been presented to the Governor for his consideration. *Id.* As such, HB 721 had not been enacted into law. *See* Mont. Const. art. VI, § 10. Under the Constitution, as with any enrolled bill, the Governor could sign it, let it become law without his signature, veto it, or issue an amendatory veto.

Simultaneously with filing their premature Complaint, Plaintiffs filed an *Ex Parte* Motion For Temporary Restraining Order & Preliminary Injunction & Motion to Show Cause, and supporting brief. (Docs. 6–7.) Hours later, Judge Seeley denied Plaintiffs' Motion for a Temporary Restraining Order and Order to Show Cause, stating: "No bill has been signed. Thus, no 'law' to enjoin today. DENIED as premature." (Doc. 11.)

ARGUMENT

Mont. R. Civ. P. 11(b) provides that by presenting to a court a pleading, written motion, or other paper, the attorney "certifies to the best of the person's knowledge, information, and belief, formed after an inquiry reasonable under the circumstances: (1) it is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) the claims, defenses, and other legal contentions are warranted by existing law or by

a nonfrivolous argument for extending, modifying, or reversing existing law or for establishing new law[.]" Failure to follow these certifications constitutes a misrepresentation to the Court and is sanctionable. *Bulen v. Navajo Ref. Co.*, 2000 MT 222, ¶ 19, 301 Mont. 195, 9 P.3d 607. "When litigants and their attorneys abuse the rules they are subject to sanctions." *Id.* The Court may impose any appropriate sanction if it determines that Rule 11(b) has been violated. Mont. R. Civ. P. 11(c)(1). "The sanction may include nonmonetary directives; an order to pay a penalty into court; or, if imposed on motion and warranted for effective deterrence, an order directing payment to the movant of part or all of the reasonable attorney fees and other expenses directly resulting from the violation." *Id*. at 11(c)(4).

The purpose of Rule 11 is to "discourage dilatory or abusive tactics and help to streamline the litigation process by lessening frivolous claims or defenses." *D'Agostino v. Swanson*, 240 Mont. 435, 444, 784 P.2d 919, 925 (1990) (citing Fed. R. Civ. P. 11 advisory committee note). Although costs and attorney's fees may be awarded for a violation of Rule 11, the rule must not be viewed simply as a fee-shifting device. *Id.*, 784 P.2d at 925. Compensation is but one aim of Rule 11. *Id.* at 444–455,784 P.2d at 925. The more important goal is punishment for wasteful and abusive litigation tactics in order to deter the use of such tactics in the future. *Id.* at 445, 784 P.2d at 925 (citing *Donaldson v. Clark*, 819 F.2d 1551, 1556 (11th Cir. 1987) ("Whether sanctions are viewed as a form of costshifting, compensating parties injured by vexatious or frivolous litigation by Rule 11, or as a form of punishment imposed on those who violate the rule, the imposition of sanctions pursuant to Rule 11 is meant to deter attorneys from violating the rule."); *see also Brown v. Fed. of State Medical Bds.*, 830 F.2d 1429, 1438 (7th Cir. 1987), ("An even more important purpose [than compensation] is deterrence."); *Westmoreland v. CBS, Inc.*, 770 F.2d 1168, 1180 (D.C. Cir. 1985) ("Rule 11 serves a dual purpose: punishment and deterrence."). If a Court finds

that a case has "no merit or has been commenced for an improper purpose, the mandatory language of the rule requires the court to impose sanctions on the offending party, his counsel[,] or both." *Id*. at 446, 784 P.2d at 926. "Failure to impose sanctions when circumstances reveal that the rule has been violated will be deemed reversible error." *Id.*, 784 P.2d at 926 (citing *Westmoreland*, 770 F.2d at 1175).

"[T]here are two grounds for imposing sanctions: the "frivolousness clause," meant to cover pleadings not grounded in fact or law; and the "improper purpose clause," meant to cover pleadings filed for an improper purpose." *In re Morin*, 2013 MT 146, ¶ 37, 370 Mont. 305, 317, 302 P.3d 96, 105. Here, Plaintiffs have violated both the frivolousness clause and the improper purpose clause by filing this lawsuit. Both grounds warrant sanctions against Plaintiffs. First, this lawsuit lacks any legal merit. As Judge Seely immediately recognized, this lawsuit and the request for a temporary restraining order are plainly premature because the suit challenged a bill that was not yet law. No reasonable attorney would contend that Montana law allows a party to file a lawsuit challenging the constitutionality of a bill before it is enacted. Because Plaintiffs plainly knew this suit was premature, the only logical conclusion is that it was filed for the improper purposes of interfering with the constitutional legislative process and initiating a public relations stunt. Moreover, Plaintiffs mounted a transparent attempt to skip to the front of the line to enjoin a bill that hasn't even been enacted. The filing of a frivolous lawsuit for improper purposes warrants the imposition of Rule 11 sanctions.

I. PLAINTIFFS' COMPLAINT IS FRIVOLOUS.

The first ground for Rule 11 sanctions is frivolousness, which requires the imposition of sanctions if a pleading or other paper is not 1) well-grounded in fact; or 2) warranted by existing law or a good faith argument for the extension, modification or reversal of existing law.

D'Agostino, 240 Mont. at 445, 784 P.2d 919 at 925. "The standard for determining whether a pleading has a sufficient factual or legal basis is reasonableness under the circumstances." *Id.*, 784 P.2d at 925 (citing *State ex rel. Sorenson v. Roske*, 229 Mont. 151, 745 P.2d 365, 368 (1987); *Zaldivar v. City of Los Angeles*, 780 F.2d 823, 830–831 (9th Cir. 1986); *Eastway Constr. Corp. v. City of N.Y.*, 762 F.2d 243, 254 (2nd Cir. 1985)).

It is undisputed that when Plaintiffs filed their Complaint, *Ex Parte* Motion For Temporary Restraining Order & Preliminary Injunction & Motion to Show Cause, and supporting brief, HB 721 was not enacted into law. Nevertheless, Plaintiffs prematurely attempted to challenge the unenacted law. But the Montana Constitution preserves "legislative power" in the "legislature consisting of a senate and a house of representatives." Mont. Const. art. V, § 1. Further, "Each bill passed by the legislature [. . .] shall be submitted to the governor for his signature. If he does not sign or veto the bill within 10 days after its delivery to him, it shall become law." Mont. Const. art. VI, § 10(1). There is no legitimate argument that Plaintiffs are not familiar with the process of how a bill becomes a law. Because they intentionally filed this action before HB 721 became law, they knowingly filed a frivolous lawsuit. The lawsuit is plainly frivolous because the Court lacks subject matter jurisdiction to adjudicate Plaintiffs' claims and because Plaintiffs have failed to state a claim upon which the Court can grant relief.[1] It is therefore not well-grounded in fact or warranted by existing law or a good faith argument for the extension, modification or reversal of existing law.

Moreover, Plaintiffs clearly knew this action was untimely. Upon Judge Seeley's denial of the *ex parte* request for a temporary restraining order as "premature," Planned Parenthood representative Martha Fuller responded: "we will renew [the motion] as soon as the governor takes

[1] *See* Defs.' Mot. to Dismiss and Br. in Support of Mot. to Dismiss (Docs. 12–13), which Defendants fully incorporate herein by reference.

action on the bill." Bradley Warren, KULR News, "Judge denies Planned Parenthood's request for a block on legislation that could ban abortion in Montana," April 12, 2023, available at https://tinyurl.com/ycy9zkwm. Planned Parenthood was fully aware that HB 721 is still working through the legislative process. In other words, they made the calculated decision to file an untimely lawsuit. And they must bear the consequences of filing prematurely. Because Plaintiffs' claims are frivolous on their face—the Court lacks subject matter jurisdiction over them—they must reckon with Rule 11. The Court must act to deter future repetitions of this conduct and preserve the constitutional sanctity of our three branches of government.

Plaintiffs knew HB 721 was not law when they filed this action. They knew the Court lacked subject matter jurisdiction to adjudicate their claims. They knew there was no relief the Court could grant. There is no legitimate argument to be made that Plaintiffs relied in good faith on existing law or a nonfrivolous argument for extending, modifying, or reversing existing law. Mont. R. Civ. P. 11(b)(2). Plaintiffs' lawyers knowingly signed onto a facially frivolous lawsuit. Rule 11 prohibits such conduct and promotes sanctions against those who engage in it. Therefore, because the lawsuit is frivolous on its face, Rule 11 sanctions are appropriate.

II. BECAUSE PLAINTIFFS KNEW THEIR COMPLAINT WAS PREMATURE, IT MUST HAVE BEEN FILED FOR THE IMPROPER PURPOSES OF INFLUENCING THE CONSTITUTIONAL LEGISLATIVE PROCESS AND PUBLICITY.

"The standard for determining whether a party acted with an improper purpose is also an objective one, that is, reasonableness under the circumstances." *D'Agostino*, 240 Mont. at 445, 784 P.2d at 925. If a Court finds that a case has "no merit or has been commenced for an improper purpose, the mandatory language of the rule requires the court to impose sanctions on the offending party, his counsel[,] or both." *Id.*, 784 P.2d at 925.

Plaintiffs filed this lawsuit three days after the Legislature passed the bill, but before the bill was submitted the bill to the Governor his consideration. Consequently, this bill is still moving through the legislative process. The judiciary has no power to interfere in the lawmaking process. (Doc. 13 at 4, 7.) The Governor has multiple options he could choose from regarding HB 721: he could sign it, he could let it become law without his signature, he can veto it, or he can return the bill to the legislature with a recommendation for an amendment. Mont. Const. art. VI, § 10.

Plaintiffs cannot legitimately claim they are unfamiliar with the legislative process. Rather, their filing of what Judge Seeley called "premature" legal proceedings is nothing more than a transparent attempt to 1) improperly influence the constitutional legislative process, 2) improperly use the courts to seek media attention; or 3) skip to the front of the line to evade the rule of law that should be applicable to all litigants before Montana courts. According to the Montana Constitution, the Legislature and the Governor must be free to exercise their constitutionally mandated legislative and executive powers without interference from the judiciary being commandeered by special interest groups thumbing their nose at the rule of law and the rules of civil procedure. If Plaintiffs oppose HB 721, they—like all litigants—must follow the proper procedural channels to express that opposition. No litigant and no attorney is permitted to exploit the judiciary by filing a premature lawsuit to improperly interfere with the constitutional lawmaking process or mounting a public relations stunt. Using litigation to oppose a bill that has not been enacted into law is plainly improper.

III. PLAINTIFFS REPEADTEDLY MISSTATED THE BURDEN OF PROOF FOR A TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION.

Numerous times in Plaintiffs' court filings, Plaintiffs violated Rule 11(b) by misrepresenting the law regarding injunctions. Plaintiffs repeatedly represented to the Court that Defendants bear the burden of showing cause why a temporary restraining order and preliminary

injunction should not issue. (Docs. 6, 7, & "Proposed Order.") This is materially false. Under the new preliminary injunction standard passed by the Legislature this Session, the moving party must "show cause" for "why the injunction should be granted." SB 191 (2023). This burden-shift is a reversal of Montana's former standard for preliminary injunction. Under the former preliminary injunction standard, the Court could set a show-cause hearing for the non-moving party to show why "the injunction should not be granted." SB 191, however, unequivocally places the burden of proof to the moving party by amending § 27-19-301(2) to read that "the judge shall make an order requiring cause to be should … **why the injunction should be granted**[.]" SB 191 (emphasis supplied).

Plaintiffs clearly knew that SB 191 was enacted and altered Montana's preliminary injunction statute, because Plaintiffs devote an entire paragraph of their Brief describing the change. (Doc. 7 at 4) (Due to recent legislation (2023 Senate Bill 191 …), as of March 2, 2023, [discusses new preliminary injunction standard]…).) What is not clear is why Plaintiffs then repeatedly misrepresented the burden and attempted to shift it back to Defendants. For example, in the "[PROPOSED] TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE" that Plaintiffs submitted to the Court, Plaintiffs wrote: "IT IS FURTHER ORDERED that the above-named Defendants appear before this Court … to show cause why a preliminary injunction should not be issued during the pendency of this action." The Motion for *Ex Parte* Temporary Restraining Order … and Show Cause Order" contains the same misrepresentation, nearly verbatim to the proposed order. (Doc. 6.)

These statements materially misrepresent the Montana statute on the issuance of preliminary injunctions. The Defendants do not bear the burden of showing why a preliminary injunction should not issue—SB 191 squarely places the burden of proof on the moving party.

Since Plaintiffs discussed SB 191, they clearly knew about this change. This misrepresentation could have been seriously detrimental to Defendants if the Court hadn't immediately denied Plaintiff's request as premature. Plaintiffs' conduct in materially misrepresenting the law to the Court is sanctionable.

IV. PROPER SACNTIONS IN THIS CASE INCLUDE AN AWARD OF FEES AND BANNING THE OUT-OF-STATE ATTORNEYS FROM APPEARING *PRO HAC VICE* IN MONTANA AS A DETERRENT.

A primary purpose of Rule 11 and the sanctions that it allows is to deter litigants and attorneys from filing lawsuits for improper purposes. Mont. R. Civ. P. 11(c)(4), *see also In re Morin*, ¶ 38 ("The purpose of Rule 11 is to discourage dilatory or abusive tactics and to streamline the litigation process by lessening frivolous claims or defenses. Monetary sanctions should not be viewed simply as a fee-shifting device because the 'more important goal is punishment for wasteful and abusive litigation tactics in order to deter the use of such tactics in the future.'") (citations omitted).

Defendants specifically request the following sanctions to deter repetition of this improper conduct: (1) that Plaintiffs be ordered to pay the costs and reasonable attorneys' fees incurred in bringing this Motion and defending against all frivolous pleadings in this lawsuit, (2) that the Court deny the *pro hac vice* applications of all of Plaintiffs' attorneys not licensed to practice in Montana and listed on Plaintiffs' Complaint; and (3) that the Court order Plaintiffs' local counsel to attend Continuing Legal Education courses through the State Bar of Montana on ethics in litigation and the Montana Rules of Civil Procedure.

This litigation serves as an improper attempt to influence the legislative process for HB 721. Immediately after filing the lawsuit, Plaintiffs issued public statements to news media outlets. As recounted above, this action not only clearly violates the Montana Rules of Civil Procedure,

the Montana Constitution, and clearly established precedents of the Montana Supreme Court, but it is a blatant violation of the Montana Rules of Professional Conduct and rules for *pro hac vice* admission.

Mont. R. Prof. Cond., Preamble (6) provides that:

> "A lawyer's conduct should conform to the requirements of the law, both in professional service to clients and in the lawyer's business and personal affairs. A lawyer should use the law's procedures only for legitimate purposes and not to harass or intimidate others. A lawyer should demonstrate respect for the legal system and for those who serve it, including judges, other lawyers and public officials. While it is a lawyer's duty, when necessary, to challenge the rectitude of official action, it is also a lawyer's duty to uphold legal process."

Further:

> "All lawyers understand that, as officers of the court, they have a duty to be truthful, which engenders trust in both the profession and the rule of law. … Trust in the integrity of the system and those who operate it is a basic necessity of the rule of law."

Id. at (14).

> "A lawyer shall not bring ….a proceeding … without having first determined through diligent investigation that there is a bona fide basis in law and fact for the position" or "for the purpose of harassment … advancement of a nonmeritorious claim or solely to gain leverage."

Mont. R. Prof. Cond. 3.1.

A principal requirement of *pro hac vice* admission is to follow both the laws of this State and the Rules of Professional Conduct. *Pro hac vice* applications must affirm "that the applicant will comply with the applicable statutes, law, and procedural rules of the state of Montana; be familiar with and comply with the Montana Rules of Professional Conduct; and submit to the jurisdiction of the Montana courts, the Montana disciplinary process, and the State Bar of Montana with respect to acts and omissions occurring during appearances under this Rule" 2016 Pro Hac Vice Application Rules VI.D.9. Plaintiffs' out-of-state lawyers have already demonstrated an

inability and unwillingness to follow this requirement. The Court should not reward this misconduct by granting *pro hac vice* admission to the nearly one-dozen out-of-state attorneys who engaged in bringing this premature, frivolous, and improper lawsuit. Rule 11 is clear that the Court should issue any sanctions necessary to deter repetition of wrongful conduct. The remedies Defendants seek are necessary to deter Plaintiffs from further engaging in the frivolous and improper conduct they displayed in this action.

CONCLUSION

Plaintiffs and their attorneys knowingly and intentionally violated the laws of Montana and disrespected the judiciary and Montana's system of government by bringing this lawsuit. The Montana Constitution and clearly established precedent of the Montana Supreme Court forbade the very claims Plaintiffs brought in this premature action. No reasonable attorney, after conducting Rule 11's mandatory reasonable inquiry, would conclude that this lawsuit was warranted by existing law and a nonfrivolous, good faith argument for the extension, modification, or reversal of existing argument. Moreover, the clear goal for Plaintiffs was to improperly use this lawsuit to gain media attention, influence the lawmaking process, and skip to the front of the line to obtain an injunction before the bill was enacted. For these reasons, the Court must appropriately sanction Plaintiffs' improper conduct by ordering Plaintiffs to pay the costs and reasonable attorneys' fees incurred in bringing this Motion and defending against all frivolous pleadings in this lawsuit, denying the *pro hac vice* applications of all of Plaintiffs' attorneys not licensed to practice in Montana, and order Plaintiffs' local counsel to attend Continuing Legal Education courses through the State Bar of Montana on ethics in litigation.

DATED this 8th day of May, 2023.

Austin Knudsen
MONTANA ATTORNEY GENERAL

Thane Johnson
Michael D. Russell
Alwyn Lansing
Assistant Attorneys General
PO Box 201401
Helena, MT 59620-1401

Emily Jones
Special Assistant Attorney General
JONES LAW FIRM, PLLC
115 N. Broadway, Suite 410
Billings, MT 59101

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Raphael Jeffrey Carlisle Graybill (Attorney)
300 4th Street North
PO Box 3586
Great Falls MT 59403
Representing: Samuel Dickman, Planned Parenthood Of Montana
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Emily Jones (Attorney)
115 North Broadway
Suite 410
Billings MT 59101
Representing: Montana DPHHS, Austin Knudsen, State of Montana, Charlie Brereton
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Michael D. Russell (Govt Attorney)
215 N Sanders
Helena MT 59620
Representing: Montana DPHHS, Austin Knudsen, State of Montana, Charlie Brereton
Service Method: eService

Alwyn T. Lansing (Govt Attorney)
215 N. Sanders St.
Helena MT 59620
Representing: Montana DPHHS, Austin Knudsen, State of Montana, Charlie Brereton
Service Method: eService

Thane P. Johnson (Govt Attorney)
215 N SANDERS ST
P.O. Box 201401
HELENA MT 59620-1401
Representing: Montana DPHHS, Austin Knudsen, State of Montana, Charlie Brereton
Service Method: eService

Electronically signed by Dia Lang on behalf of Austin Miles Knudsen
Dated: 05-08-2023