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*Attorneys for Secretary of State Christi Jacobsen*

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

JERRY O'NEIL, GENE  
KIRSCHBAUM, RUSSELL SIAS,  
BARBARA LEVITT (Assembled  
Voter), DARELL LEVIT (Assembled  
Voter), and OTHER ASSEMBLED  
VOTERS,

Plaintiffs,

v.

THE MONTANA SUPREME  
COURT, THE STATE BAR OF  
MONTANA, and THE MONTANA  
SUPREME COURT AND THE  
STATE BAR OF MONTANA,  
JOINED TOGETHER AS THE  
INTEGRATED BAR OF  
MONTANA, and MONTANA  
SECRETARY OF STATE CHRISTI  
JACOBSEN,

Defendants.

Cause No. CV 23-161-M-DLC-KLD

**DEFENDANT SECRETARY OF  
STATE CHRISTI JACOBSEN'S  
MOTION TO DISMISS  
PLAINTIFFS' AMENDED  
COMPLAINT**

Defendant, Montana Secretary of State Christi Jacobsen, by and through her counsel of record, moves the Court, pursuant to Fed. R. Civ. P. 12(b)(1) and/or Fed. R. Civ. P. 12(b)(6), for an Order dismissing Plaintiffs' Amended Complaint (Doc. 14).

A brief in support is filed herewith pursuant to Local Rule 7.1(d)(1)(A). In accordance with Local Rule 7.1(c)(1), Plaintiffs have been contacted, and Plaintiffs oppose this Motion to Dismiss.

DATED this 4th day of March, 2024.

MONTANA SECRETARY OF STATE  
CHRISTI JACOBSEN

**/s/ CLAY R. LELAND**  
AUSTIN MARKUS JAMES  
CLAY R. LELAND  
*Attorneys for Secretary of State*

**CERTIFICATE OF SERVICE**

I certify that on this date, an accurate copy of the foregoing document was served electronically through the Court's CM/ECF system on registered counsel.

Dated: March 4, 2024

/s/ Clay R. Leland  
Clay R. Leland