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Appearances continued on next page

**MONTANA FOURTH JUDICIAL DISTRICT COURT,
MISSOULA COUNTY**

CASEY PERKINS, an individual;
SPENCER MCDONALD, an
individual; KASANDRA
REDDINGTON, an individual; JANE
DOE, an individual; JOHN DOE, an
individual; and MISSOULA COUNTY,

Plaintiffs,

vs.

STATE OF MONTANA;
GREGORY GIANFORTE, in his
official capacity as Governor of
the State of Montana; and AUSTIN
KNUDSEN, in his official capacity
as Attorney General of the State of
Montana,

Defendants,

and

KERRI SEEKINS-CROWE,

Intervenor-Defendant.

Dept. No. 1
Hon. Leslie Halligan
DV-32-2025-282

**PLAINTIFFS' MOTION FOR
SUMMARY JUDGMENT**

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**Admitted Pro Hac Vice*

Plaintiffs, by and through counsel, move this Court pursuant to Rule 56 of the Montana Rules of Civil Procedure for summary judgment on all claims (Counts I-IV of the Amended Complaint, Doc. 45). As set forth in the accompanying documents, there is no genuine dispute as to any material fact, and Plaintiffs are entitled to judgment as a matter of law.

CERTIFICATION PURSUANT TO LOCAL RULE 3(H)(2)

Counsel for Plaintiffs contacted counsel for the State of Montana via email regarding their position on this motion. Counsel for the State of Montana indicated that they object to this motion.

Counsel for Plaintiffs contacted counsel for Intervenor-Defendant Kerri Seekins-Crowe via email regarding their position on this motion. Counsel for Intervenor-Defendant indicated that they object to this motion.

REQUEST FOR RELIEF

Accordingly, Plaintiffs respectfully request that the Court:

1. Grant summary judgment in their favor on all counts;
2. Declare that HB 121 (2025) is unconstitutional;
3. Enjoin Defendants, as well as their agents, employees, representatives, and successors, from enforcing HB 121, directly or indirectly; and
4. Grant such other relief as the Court deems just and proper.

This motion is supported by Plaintiffs' Brief in Support, Statement of Undisputed Facts, and all accompanying declarations and exhibits.

Dated this 3rd day of April 2026.

Respectfully submitted,
/s/ Robin Turner
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CERTIFICATE OF SERVICE

I, Robin Turner, hereby certify that on April 3, 2026, I served true and accurate copies of the foregoing Motion, Supporting Brief, and Statement of Undisputed Facts on the following by electronic filing:

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Thane Johnson
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Alwyn Lansing
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Electronically signed by Robin Turner
Dated: April 3, 2026

CERTIFICATE OF SERVICE

I, Robin Michelle Turner, hereby certify that I have served true and accurate copies of the foregoing Motion - Motion for Summary Judgment (Non Government and Government) to the following on 04-03-2026:

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Electronically Signed By: Robin Michelle Turner

Dated: 04-03-2026