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*Attorneys for Montana Republican
Legislative Campaign Committee*

IN THE SUPREME COURT OF THE STATE OF MONTANA

**STATE OF MONTANA, by and
through its SECRETARY OF
STATE, COREY STAPLETON,**

Appellant,

v.

**JAMES LARSON, DONALD
JUDGE, and JEAN PRICE,
individual electors, and MONTANA
DEMOCRATIC PARTY,'**

Appellees,

and

MONTANA GREEN PARTY,

Interested Party.

Case No. DA 18-0414

**MONTANA REPUBLICAN
LEGISLATIVE CAMPAIGN
COMMITTEE'S MOTION FOR
ADMISSION *PRO HAC VICE***

Amicus Curiae Montana Republican Legislative Campaign Committee (“MRLCC”), through its counsel Austin Knudsen, respectfully moves the Court to enter an order in the form filed concurrently with this Motion, admitting Edward D. Greim *pro hac vice* to practice before the Court as counsel for MRLCC. In support of this Motion, MRLCC states as follows:

1. MRLCC respectfully requests that this honorable Court, pursuant to Section VI of the Rules of Admission to the State Bar of Montana, allow Mr. Greim, an attorney licensed to practice law, and continuously engaged in the practice of law since 2002, to appear and participate in this matter as counsel for MRLCC. Mr. Greim’s contact information is as follows:

Edward D. Greim
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2. MRLCC has been represented in this action, and will continue to be represented in this action by the undersigned, its current local counsel of record, Austin Knudsen, in accordance with Section VI of the Rules of Admission to the State Bar of Montana. The undersigned will continue to sign all pleadings, motions, briefs, and participate actively in this case as well as supervise Mr. Greim.

3. On August 9, 2018, Mr. Greim sent his *Pro Hac Vice* Application to the State Bar of Montana. The application was received by the State Bar of Montana

on August 9, 2018 and filed in this Court on August 17, 2018. A copy of the application, which has been submitted to, and received by the State Bar of Montana, is attached as **Exhibit A**.

4. Mr. Greim earned his Juris Doctor in 2002 from Harvard Law School.

5. Mr. Greim has been a member in good standing of the highest court of the State of Missouri since September 18, 2002. In addition, Mr. Greim has been admitted to practice before the following courts:

Court:	Admission Date:
United States District Court for the Western District of Missouri	October 25, 2002
Bar of the State of Kansas	May 9, 2003
United States District Court for the District of Kansas	July 13, 2003
Bar of the State of New York	June 7, 2004
United States District Court for the Southern District of New York	November 12, 2004
United States District Court for the Western District of Michigan	July 29, 2008
United States Court of Appeals for the Sixth Circuit	September 4, 2008
United States Court of Appeals for the Eighth Circuit	March 30, 2009
United States Court of Appeals for the Seventh Circuit	April 21, 2017

United States District Court for
the Eastern District of Missouri

June 22, 2017

United States District Court for
the District of Columbia

August 6, 2018

6. Mr. Greim is presently a member in good standing of the bars of the courts listed above. Mr. Greim has never been subject to grievance or involuntary removal proceedings while a member of the bar of any state or federal court.

7. Although attorneys at Mr. Greim's firm have appeared *pro hac vice* in two other matters before Montana courts, good cause exists to permit him to appear and be added as an attorney of record for MRLCC for all purposes in connection with this case.

8. Mr. Greim is a partner at Graves Garrett, LLC, and will greatly assist in representing MRLCC as *amicus curiae* in the above captioned matter. He has substantial experience in political and election law in general and initiative and ballot measures in particular. He has litigated more than a dozen initiative and ballot petition matters in jurisdictions throughout the United States. His expertise will substantially and significantly aid MRLCC in its appearance in this case. Accordingly, there is good cause to permit Mr. Greim to appear under Montana's *pro hac vice* rules.

WHEREFORE, Movant respectfully requests that the Court enter an order granting the admission of Edward D. Greim *pro hac vice* in this case.

Dated: August 21, 2018

Respectfully submitted,

/s/ Austin Knudsen

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*Attorney for Amicus Curiae
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Certificate of Compliance

Pursuant to Rule 11(4) of the Montana Rules of Appellate Procedure, I certify that this Brief is printed with a proportionally spaced Times New Roman text typeface of 14 points; is double spaced; and the word count calculated by Microsoft Word is not more than 5,000 words, excluding the caption, signature block, certificate of service, and certificate of compliance.

Dated: August 21, 2018

/s/ Austin Knudsen

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Certificate of Service

The undersigned counsel hereby certifies on August 21, 2018, I sent a copy of the foregoing to the counsel below via email:

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Dated: August 21, 2018

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CERTIFICATE OF SERVICE

I, Austin Miles Knudsen, hereby certify that I have served true and accurate copies of the foregoing Motion - Pro Hac Vice - State Bar Certification and Application to the following on 08-21-2018:

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Electronically Signed By: Austin Miles Knudsen

Dated: 08-21-2018