

IN THE SUPREME COURT OF THE STATE OF MONTANA

No. DA 19-0077

ALEXIS NUNEZ and HOLLY McGOWAN,

Plaintiffs/Appellees,

v.

WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC.;
CHRISTIAN CONGREGATION OF JEHOVAH'S WITNESSES and
THOMPSON FALLS CONGREGATION OF JEHOVAH'S WITNESSES,

Defendants/Appellants,

WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC.;
CHRISTIAN CONGREGATION OF JEHOVAH'S WITNESSES and
THOMPSON FALLS CONGREGATION OF JEHOVAH'S WITNESSES,

Third-Party Plaintiffs, Appellants,

v.

MAXIMO NAVA REYES and IVY McGOWAN-CASTLEBERRY,

Third-Party Defendants.

NOTICE OF INTERVENTION

On July 22, 2019, Appellees served on the office of the Attorney General
a notice pursuant to Mont. R. App. P. 27 that Appellees challenge the
constitutionality of Section 27-1-220(3), Mont. Code Ann., which limits an

award for punitive damages to the lesser of \$10 million or 3% of a defendant's net worth. Pursuant to Mont. R. App. P. 27, Tim Fox, Attorney General, respectfully informs the Court and counsel that his office will intervene for the limited purpose of defending the constitutionality of Section 27-1-220(3), Mont. Code Ann.

Respectfully submitted this 24th day of July, 2019.

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Attorney General
MATTHEW COCHENOUR
Acting Solicitor General
JON BENNION
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By: /s/ Jon Bennion
JON BENNION
Chief Deputy Attorney General

CERTIFICATE OF SERVICE

I, Jonathan William Bennion, hereby certify that I have served true and accurate copies of the foregoing Notice - Notice to Intervene to the following on 07-24-2019:

Tessa Anne Keller (Attorney)
Garlington, Lohn & Robinson, PLLP
P.O. Box 7909
Missoula MT 59807

Representing: Christian Congregation of Jehovah's Witnesses, Thompson Falls Congregation of Jehovah's Witnesses, Watchtower Bible & Tract Society of New York, Inc.
Service Method: eService

James P. Molloy (Attorney)
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Representing: Holly McGowan, Alex Nunez
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Ivy McGowan-Castleberry (Appellee)
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Maximo Reyes (Appellee)
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Electronically signed by Dawn Lane on behalf of Jonathan William Bennion
Dated: 07-24-2019