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*Attorneys for Appellants and Counter-Defendants*

**IN THE SUPREME COURT OF THE STATE OF MONTANA**

<p>MOORE FAMILY COMPANY and MOORE REVOCABLE LIVING TRUST DATED NOVEMBER 14, 2019,</p> <p style="text-align: center;">Plaintiff and Appellants,</p> <p>v.</p> <p>TIMOTHY C. KELLY and MARTHA EVERT KELLY as TRUSTEE of the TIMOTHY C. KELLY AND MARTHA EVERT KELLY REVOCABLE TRUST, U/A/D/ DECEMBER 8, 2008,</p> <p style="text-align: center;">Defendants, Appellees and Cross-Appellants.</p>	<p>Supreme Court No. DA 24-0016</p> <p style="text-align: center;"><b>DECLARATION OF ALYSSA CAMPBELL IN SUPPORT OF FOURTH MOTION TO HOLD APPEAL IN ABEYANCE</b></p>
<p>TIMOTHY C. KELLY and MARTHA EVERT KELLY as TRUSTEE of the TIMOTHY C. KELLY AND MARTHA EVERT KELLY REVOCABLE TRUST, U/A/D/ DECEMBER 8, 2008,</p> <p style="text-align: center;">Counter Claimants,</p> <p>v.</p> <p>MOORE FAMILY COMPANY and ROBERT B. MOORE and ELIZABETH J. MOORE as TRUSTEES of the MOORE REVOCABLE LIVING TRUST DATED NOVEMBER 14, 2019,</p> <p style="text-align: center;">Counter-Defendants.</p>	


Per Mont. Code Ann. § 1-6-105, the undersigned declares as follows:

1. The parties conducted a mediation on April 2, 2024, at which time they executed a memorandum of understanding regarding the basic terms of a complex settlement agreement to be negotiated and executed thereafter.
2. Since that time, the parties have exchanged many drafts of two different, necessary agreements.
3. The process has been slowed due to the complicated nature of the settlement, but has been further delayed by medical emergencies suffered by both Robert and Betty Moore, as well as the unprecedented storm and related damage which occurred in Missoula on July 24, 2024.
4. Despite these hurdles, the parties are very close to finalizing the settlement documents, with only a few remaining provisions still up for negotiation.
5. The parties are confident they will be able to finalize the settlement in the next month, assuming no additional unforeseen emergencies cause further delays.

I DECLARE THESE STATEMENTS TO BE TRUE UNDER PERJURY OF LAW.

DATED this 31st day of July, 2024.

MILODRAGOVICH, DALE  
& STEINBRENNER, P.C.

By:   
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