

IN THE SUPREME COURT OF MONTANA

No. DA 23-0462

City of Kalispell,
Plaintiff and Appellee,

v.

Sean Michael Doman,
Defendant and Appellant

On appeal from the Montana Eleventh Judicial District Court, Flathead County,
the Honorable Robert Allison, Presiding

**DECLARATION OF
BRIDGET LAVENDER IN SUPPORT OF UNOPPOSED MOTION FOR
PRO HAC VICE APPEARANCE OF BRIDGET LAVENDER**

Alex Rate
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Bridget Lavender*
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**pro hac vice forthcoming
Attorneys for amici curiae*

DECLARATION OF BRIDGET LAVENDER

I, Bridget Lavender, pursuant to § 1-6-105, MCA, state and affirm that the following facts are true and correct to the best of my knowledge:

1. I am a resident of New York. My residential address is as follows:
437 Pacific Street #3, Brooklyn NY 11217.

2. I am a legal fellow with the American Civil Liberties Union Foundation, Inc. (“ACLU”), State Supreme Court Initiative. My office address is:

Bridget Lavender
American Civil Liberties Union Foundation, Inc
125 Broad Street, 18th Floor
New York, NY 10004

3. I am submitting this declaration in support of my motion for *pro hac vice* admission in the case titled *Kalispell v. Doman*, Case No. DA 23-0462 pending in the Supreme Court of Montana.

4. I received my J.D. *magna cum laude* from the University of Pennsylvania Carey Law School in 2021. I then served as a law clerk in the Utah Supreme Court from 2021 to 2022 and in the U.S. District for the Middle District of North Carolina from 2022 to 2023. I assumed my current role as a legal fellow at the State Supreme Court Initiative of the ACLU in October 2023. My practice at the ACLU focuses on litigating civil rights and liberties issues in state courts around the country.

5. I have significant experience and expertise litigating issues central to this case, including individual rights under state constitutions and issues related

to free speech and expression. For example, in *Smith v. Bluecross Blueshield of Tennessee*, No. 21-0938, currently pending before the Tennessee Supreme Court, I filed an amicus brief arguing that the right to petition under Tennessee's First Amendment analogue was broader than the right guaranteed under the First Amendment.

6. I have read and intend to comply with the Montana Rules of Civil Procedure and the Montana Rules of Professional Conduct.

7. The attorney of record with whom I have associated for the matter pending before this Court, Alex Rate, is a member of the Montana bar and the Legal Director of the ACLU of Montana. The ACLU often litigates cases alongside our local ACLU affiliates, such as the ACLU of Montana. These affiliates sometimes have limited staff and resources to litigate complex and resource-intensive cases such as this one and benefit from the experience of attorneys at the national ACLU with regard to particular subject matters, including issues relating to state and federal constitutional law.

8. I am admitted to practice in the Appellate Division of the Supreme Court of the State of New York, Third Division (01/19/2022).

9. My New York Bar number is 1175453.

10. I am in good standing in all courts to which I am admitted. I have not been disciplined by any state or federal bar and there are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.

11. I declare under penalty of perjury that the foregoing is true and

correct.

DATED this 18th day of February 2025.

Respectfully submitted,

/s/ Bridget Lavender

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Applicant Attorney