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\*motion for admission *pro hac vice*  
forthcoming

*Attorneys for Plaintiff-Intervenors*

MONTANA FIRST JUDICIAL DISTRICT COURT  
COUNTY OF LEWIS AND CLARK

MONTANA FEDERATION OF PUBLIC  
EMPLOYEES,  
Plaintiff,

NORTHERN CHEYENNE TRIBE, BLACKFEET  
NATION, CONFEDERATED SALISH AND  
KOOTENAI TRIBES, FORT BELKNAP INDIAN  
COMMUNITY, and WESTERN NATIVE VOICE,  
Plaintiff-Intervenors,

v.

STATE OF MONTANA, and CHRISTI JACOBSEN,  
in her official capacity as Montana Secretary of  
State,  
Defendants.

Cause No. DV-25-268

**MOTION TO INTERVENE**

Pursuant to Montana Rule of Civil Procedure 24(a) proposed Plaintiff-Intervenors, the Northern Cheyenne Tribe, the Blackfeet Nation, the Confederated Salish and Kootenai Tribes (“CSKT”), the Fort Belknap Indian Community (“Fort Belknap”), (collectively, “Tribal Plaintiffs”), and Western Native Voice (all together, “Native American Plaintiffs”), respectfully move to intervene as of right. Alternatively, the Native American Plaintiffs move for permissive intervention under Montana Rule of Civil Procedure 24(b).

Native American Plaintiffs’ counsel provided notice of this motion to Plaintiffs’ counsel and Defendants’ counsel on June 23, 2025. Plaintiffs do not oppose this motion. Defendants do oppose this motion.

Native American Plaintiffs are contemporaneously filing their brief in support of this motion for intervention as well as their responsive pleading as required by Rule 24(c). Native American Plaintiffs further respectfully request that if their motion is granted, the attached responsive pleading, Exhibit A, be docketed in this case.

DATED THIS 24th day of June 2025.

/s/ Alex Rate  
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\*motion for admission *pro hac vice* forthcoming

*Attorneys for Plaintiff-Intervenors*

## **CERTIFICATE OF SERVICE**

I, Alexander H. Rate, hereby certify that I have served true and accurate copies of the foregoing Motion - Motion to Intervene to the following on 06-24-2025:

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Service Method: Other Means by Consent

Electronically signed by Krystel Pickens on behalf of Alexander H. Rate

Dated: 06-24-2025