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MAY 25 2022
ANGIE SPANGLER, Clerk of District Court
Deputy Clerk

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Attorneys for Defendants

MONTANA FIRST JUDICIAL DISTRICT COURT
LEWIS AND CLARK COUNTY

RIKKI HELD, ET AL., PLAINTIFFS, v. STATE OF MONTANA, ET AL., DEFENDANTS.	Cause CDV-2020-307 Hon. Kathy Seeley AFFIDAVIT OF EMILY JONES
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Emily Jones states under oath:

1. I am over 18 years old, and I have personal knowledge of the facts stated in this Affidavit.
2. I serve as a Special Assistant Attorney General in the Montana Department of Justice.
3. I am lead counsel for the State Defendants in this case.


4. On May 9, 2022, co-counsel Tim Longfield and I met and conferred telephonically with counsel for Plaintiffs to discuss both parties' concerns about the current scheduling order.

5. I informed opposing counsel that it would, in my view, not be possible to conduct the number of depositions required in this case before the July 15, 2022, close of discovery under the current scheduling order.

6. I also noted that this concern was amplified by the fact that the parties hadn't yet disclosed expert witnesses.

7. Despite my expression of these concerns, opposing counsel did not inform counsel for the State that Plaintiffs planned to disclose nine expert witnesses.

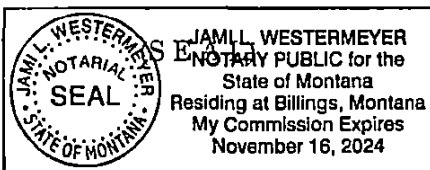
DATED this 23rd day of May, 2022.

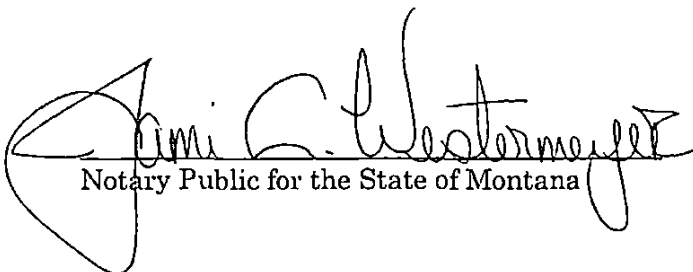


EMILY JONES
Special Assistant Attorney General

STATE OF MONTANA)
 :ss.
County of Yellowstone)

SUBSCRIBED AND SWORN TO before me, a Notary Public for the State of
Montana, on May 23, 2022.





Notary Public for the State of Montana

CERTIFICATE OF SERVICE

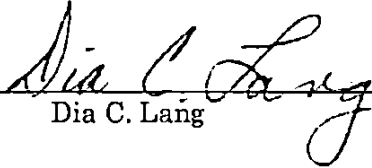
I certify a true and correct copy of the foregoing was delivered by email to the following:

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Date: May 23, 2022


Dia C. Lang