

Melissa Hornbein  
Barbara Chillcott  
Western Environmental Law Center  
103 Reeder's Alley  
Helena, MT 59601  
(406) 708-3058  
hornbein@westernlaw.org  
chillcott@westernlaw.org

Roger Sullivan  
Dustin Leftridge  
McGarvey Law  
345 1st Avenue East  
Kalispell, MT 59901  
(406) 752-5566  
rsullivan@mcgarveylaw.com  
dlefridge@mcgarveylaw.com

Nathan Bellinger (*pro hac vice*)  
Our Children's Trust  
1216 Lincoln Street  
Eugene, OR 97401  
(413) 687-1668  
nate@ourchildrenstrust.org

*Attorneys for Plaintiffs*

MONTANA FIRST JUDICIAL DISTRICT COURT  
LEWIS AND CLARK COUNTY

RIKKI HELD, et al.,  Plaintiffs,  v.  STATE OF MONTANA, et al.,  Defendants.	No. CDV-2020-307  Hon. Kathy Seeley  <b>DECLARATION OF NATHAN BELLINGER IN SUPPORT OF PLAINTIFFS' MOTION FOR RULE 26(f) DISCOVERY CONFERENCE</b>
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Pursuant to MCA §1-6-105, Nathan Bellinger, hereby declares as follows:

1. I am an attorney admitted *pro hac vice* before the Montana First Judicial District Court, Lewis and Clark County, in the State of Montana and an attorney of record for Plaintiffs

**FILED**  
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ANGIE SPANGLER, Clerk of District Court  
Deputy Clerk

herein. I have personal knowledge of the facts stated herein, except as to those stated on information and belief, and if called to testify, I would and could testify competently thereto.

2. On **March 18, 2022**, I received Defendants' First Set of Discovery Requests to Plaintiffs. Plaintiffs responded on April 20, 2022, and supplemented on May 27, 2022 and June 10, 2022.
3. On **April 20, 2022**, I served Plaintiffs' First Discovery Requests on Defendants, to which the Defendants responded on May 20, 2022, and then supplemented on June 8, 2022.
4. On **May 27, 2022**, Plaintiffs served four 30(b)(6) deposition notices on four Defendant agencies, and on June 2, 2022, Plaintiffs served 17 deposition notices for the expert and "hybrid" fact/expert witnesses Defendants disclosed on June 1.
5. On **June 9, 2022**, Ms. Jones indicated by email that the dates noticed for the 30(b)(6) depositions for DEQ and DNRC would not work and that she would be in touch with available dates.
6. On **June 3, 2022**, I emailed Defendants' counsel to meet and confer on discovery issues, stating that "we trust that Defendants will promptly respond to the issues raised in this letter, as we appreciate that neither side would want to unnecessarily involve the Court in a discovery dispute." On June 3, 2022, Defendants also sent a letter addressing discovery issues.
7. On **June 6, 2022**, I spoke with Timothy Longfield in an attempt to resolve these issues. Mr. Longfield stated that Defendants were reviewing the June 3 discovery letter and would respond "in due course." Mr. Longfield was unwilling to confirm dates or places for the

30(b)(6) depositions and the depositions of Defendants' expert witness and hybrid witnesses.

8. On June 8, 2022, Defendants' noticed depositions of Plaintiffs' 12 expert witnesses, 16 youth plaintiffs, and 12 plaintiff parent/guardians.

Pursuant to MCA §1-6-105, I declare that the foregoing is true and correct.

Executed this 10th day of June, 2022.

/s/ Nathan Bellinger  
Nathan Bellinger (*pro hac vice*)