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Counsel for Defendant Secretary of State

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
HELENA DIVISION

ZANE GREY,  Plaintiff,  v.  CHRISTI JACOBSEN, Montana Secretary of State; CHRISTI JACOBSEN (personal capacity); NICOLE SCRIBNER, Sanders County Elections Director; NICOLE SCRIBNER (personal capacity); ELECTIONS SYSTEM & SOFTWARE, LLC; Defendants.	Case No. CV 22-82-M-BMM  <b>DEFENDANT SECRETARY OF STATE’S MOTION TO DISMISS</b>
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Defendant Christi Jacobsen, Montana Secretary of State (“the Secretary”), by and through counsel, moves the Court to dismiss Plaintiff Zane Grey’s claims against the Secretary pursuant to Fed. R. Civ. P. 12(b)(1) because Mr. Grey has failed to plead facts which establish standing to bring this action. A brief in support is concurrently filed.

Respectfully submitted this 14th day of June 2022.

By: /s/ Alan Zackheim  
ALAN ZACKHEIM  
Assistant Attorney General  
Counsel for Secretary of State

**CERTIFICATE OF SERVICE**

I hereby certify that on this date I electronically filed the foregoing document with the clerk of the court for the United States District Court for the District of Montana, using CM/ECF system.

I hereby certify that on June 14, 2022, a copy of the foregoing document was served on the following persons by the following means:

- 1   CM/ECF
- Hand Delivery
- 2   Mail
- Overnight Delivery Service
- Fax
- E-Mail

1. Clerk, U.S. District Court
2. Zane Grey  
P.O. Box 1550  
Noxon, MT 59853

By: /s/ Alan Zackheim  
ALAN ZACKHEIM  
Assistant Attorney General  
Counsel for Defendants