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*Attorneys for Plaintiffs*

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

	)	
	)	CV 22-127-M-DWM
	)	
IN RE: CONDITIONS AT LAKE	)	<b>Plaintiffs' Motion for</b>
COUNTY JAIL,	)	<b>Class Certification</b>
	)	
	)	
	)	

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Plaintiffs respectfully move for class certification pursuant to Fed. R. Civ. P. 23. Plaintiffs ask the Court to certify the following Class and Subclass:

1. Conditions Class”: All persons who are, have been, or will be incarcerated at the Lake County jail from September 3, 2018, through September 15, 2022.
2. “Tribal Member Subclass”: All enrolled members of the Confederated Salish and Kootenai Tribes who are, have been, or will be incarcerated at the Lake County jail from September 3, 2018, through September 15, 2022.

Pursuant to Local Rule 7.1(c)(1), Counsel for Defendant Lake County were contacted, and Defendant Lake County opposes the relief sought. Defendant Greg Gianforte has not yet appeared in this action.

DATED this 28th day of July, 2022.

/s/Timothy M. Bechtold  
BECHTOLD LAW FIRM

/s/Constance Van Kley  
UPPER SEVEN LAW

*Attorneys for Plaintiffs*