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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
GREAT FALLS DIVISION**

<p>Susan Webber, Jonathan St. Goddard, Rhonda Mountain Chief and David Mountain Chief,</p> <p>Plaintiffs,</p> <p>vs.</p> <p>U.S. DEPARTMENT OF HOMELAND SECURITY, THE UNITED STATES OF AMERICA, and, in her official capacity, KRISTI NOEM,</p> <p>Defendants.</p>	<p>Cause No. CV 25-26-GF-DLC</p> <p><b>PLAINTIFFS MOTION FOR RECONSIDERATION UNDER RULE 59(e) OF FINAL ORDER DOC. NO. 40</b></p>
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Susan Webber, Jonathan St. Goddard, Rhonda Mountain Chief, and David Mountain Chief, enrolled members of the Blackfeet Tribe, respectfully move this Court to reconsider its Final Order transferring this case to the Court of International Trade (Doc. 40).

This motion is brought under Federal Rule of Civil Procedure 59(e) and F.R.A.P. 4(a)(4)(A), on the grounds that the transfer was based on manifest legal

error and resulted in an improper divestiture of this Court's jurisdiction over Plaintiffs' constitutional claims. A brief filed contemporaneously supports this motion.

Pursuant to L.R. 7.3 Plaintiffs request reconsideration of a final order; L.R. 7.3 applies to interlocutory orders and therefore this motion and brief are filed under Rule L.R. 7.1.

Government counsel was contacted regarding this motion but no response has been received at the time of this filing.

Respectfully submitted this 28<sup>th</sup> day of April, 2025.

TRANEL LAW FIRM, P.C.

By: /s/ *Monica Tranel*  
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