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Attorneys for Defendants.

**MONTANA FIFTH JUDICIAL DISTRICT COURT,
MADISON COUNTY**

STATE OF MONTANA,)	Cause Nos. DC-29-2022-022
)	DC-29-2022-023
)	DC-29-2022-024
Plaintiff,)	DC-29-2022-026
)	
vs.)	
)	
JESSE MICHAEL BOYD, BETHANY)	MOTION TO MODIFY
GRACE BOYD, CARTER NORMAN)	CONDITIONS OF RELEASE AS
PHILLIPS, and ERIC ANTOHONY TRENT,)	UNCONSTITUTIONALLY IMPOSED
)	
Defendants.)	
)	

COME NOW Defendants Jesse M. Boyd (“Boyd”), Carter N. Phillips (“Phillips”), Bethany Boyd (“Bethany”), and Eric Trent (“Trent”), by and through their counsel of record, and hereby move to modify the conditions of their release, as these conditions were unconstitutionally imposed. Defendants seek removal of their ankle monitors and reductions in their bonds. The basis for the relief requested is described more fully in the supporting brief filed concurrently.

RESPECTFULLY SUBMITTED this 9th day of January 2023.

PLANALP & ROOTS, P.C.

/s/ Alexander L. Roots

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CERTIFICATE OF SERVICE

I, Alexander Louis Roots, hereby certify that I have served true and accurate copies of the foregoing Motion - Motion to Modify to the following on 01-09-2023:

David A. Buchler (Govt Attorney)
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Representing: State of Montana
Service Method: eService

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215 N. Sanders
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Representing: State of Montana
Service Method: eService

Electronically Signed By: Alexander Louis Roots
Dated: 01-09-2023