

<p>SUPREME COURT OF COLORADO  2 East 14<sup>th</sup> Avenue  Denver, Colorado 80203</p>	<p>DATE FILED: May 3, 2018 12:45 PM</p>
<p>Original Proceeding  Pursuant to Colo. Rev. Stat. §1-40-107(2)  Appeal from the Ballot Title Board</p>	
<p>In the Matter of the Title, Ballot Title, and  Submission Clause for Proposed Initiative 2017-  2018, #178 (“Regulation of Oil and Gas  Development”)</p> <p><b>Petitioner:</b> JANETTE S. ROSE</p> <p>v.</p> <p><b>Respondents/Proponents:</b> JOHN BRACKNEY  and GUILLERMO DEHERRERA</p> <p><b>and</b></p> <p><b>Ballot Title Board:</b> SUZANNE STAIERT,  GLENN ROPER, and JASON GELENDER</p>	<p><b>▲ COURT USE ONLY ▲</b></p>
<p>Attorneys for Petitioner:</p> <p>Edward T. Ramey, #6748  Martha M. Tierney, #27521  Tierney Lawrence LLC  225 East 16<sup>th</sup> Avenue, Suite 350  Denver, CO 80203  Telephone: 720-242-7585; 720-242-7577  Email: <a href="mailto:eramey@tierneylawrence.com">eramey@tierneylawrence.com</a>;  <a href="mailto:mtierney@tierneylawrence.com">mtierney@tierneylawrence.com</a></p>	<p>Supreme Court Case No.  2018SA113</p>
<p><b>PETITIONER’S UNOPPOSED MOTION FOR CONSOLIDATION  OF SUPREME COURT CASE NOS. 2018SA113, 2018SA114,  2018SA115, AND 2018SA116</b></p>	

Janette S. Rose, Petitioner in Case Numbers 2018SA113, 2018SA114, 2018SA115, and 2018SA116 (“Petitioner”), respectfully requests the Court to consolidate the briefing and review of their Petitions in each of the aforementioned cases.

In support of this Motion, Petitioner states that the issues before the Court are virtually identical in these four cases, the parties and their counsel are identical, the proposed initiative measures are very similar and were submitted to and ruled upon by the Ballot Title Board concurrently, and the basis for Petitioner’s objections to the actions of the Ballot Title Board are virtually identical in each case.

Undersigned counsel for the Petitioner has conferred with Jason R. Dunn, counsel for the Respondents/Proponents, and Assistant Attorney General Matthew D. Grove, counsel for the Respondent Ballot Title Board, and has been authorized to state that the Respondents do not oppose this Motion.

Respectfully submitted this 3rd day of May, 2018.

*s/Edward T. Ramey*

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**ATTORNEYS FOR PETITIONER**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 3rd day of May, 2018, a true and correct copy of the foregoing was filed and served via electronic mail and the Court's E-filing system upon the following:

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