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SUPREME COURT OF COLORADO

2 East 14<sup>th</sup> Avenue  
Denver, Colorado 80203

Original Proceeding  
Pursuant to Colo. Rev. Stat. §1-40-107(2)  
Appeal from the Ballot Title Board

In the Matter of the Title, Ballot Title, and Submission  
Clause for Proposed Initiative 2017-2018, #109 (“Just  
Compensation for Damage Due to Government Law or  
Regulation”)

**Petitioners:** JANETTE S. ROSE, SUSAN MCCLAIN,  
and GEORGIANA INSKEEP

v.

**Respondents:** MICHELLE SMITH and CHAD  
VORTHMANN

**and**

**Title Board:** SUZANNE STAIERT, GLENN ROPER,  
and JASON GELENDER

▲ COURT USE ONLY ▲

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Supreme Court Case No.  
2018SA43

**PETITIONERS’ UNOPPOSED MOTION FOR CONSOLIDATION OF SUPREME  
COURT CASE NOS. 2018SA42, 2018SA43, 2018SA44, 2018SA45, 2018SA46, AND  
2018SA47**

Janette S. Rose, Susan McClain, and Georgiana Inskeep, Petitioners in Case Numbers 2018SA42, 2018SA43, 2018SA44, 2018SA45, 2018SA46, and 2018SA47 (“Petitioners”), respectfully request the Court to consolidate the briefing and review of their Petitions in each of the afore-listed cases.

In support of this Motion, Petitioners state that the issues before the Court are virtually identical in these six 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 Petitioners’ objections to the actions of the Ballot Title Board are virtually identical in each case.

Undersigned counsel for the Petitioners 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 1st day of March, 2018.

*s/Edward T. Ramey*

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**ATTORNEYS FOR PETITIONERS**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 1st day of March, 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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