

<p>SUPREME COURT OF COLORADO 2 East 14th Avenue Denver, Colorado 80203</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, #113 (“Taking Property for Public Use”)</p> <p>Petitioners: JANETTE S. ROSE, SUSAN MCCLAIN, and GEORGIANA INSKEEP</p> <p>v.</p> <p>Respondents: MICHELLE SMITH and CHAD VORTHMANN</p> <p>and</p> <p>Title Board: SUZANNE STAIERT, GLENN ROPER, and JASON GELENDER</p>	<p>▲ COURT USE ONLY ▲</p>
<p>Attorneys for Petitioners: Martha M. Tierney, #27521 Edward T. Ramey, #6748 Tierney Lawrence LLC 225 East 16th Avenue, Suite 350 Denver, CO 80203 Telephone: 720-242-7577; 720-242-7585 Email: mtierney@tierneylawrence.com; eramey@tierneylawrence.com</p>	<p>Supreme Court Case No. 2018SA47</p>
<p>PETITIONERS’ UNOPPOSED MOTION FOR CONSOLIDATION OF SUPREME COURT CASE NOS. 2018SA42, 2018SA43, 2018SA44, 2018SA45, 2018SA46, AND 2018SA47</p>	

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

Martha M. Tierney, #27521

Edward T. Ramey, #6748

Tierney Lawrence LLC

225 East 16th Avenue, Suite 350

Denver, CO 80203

Telephone: 720-242-7577; 720-242-7585

Email: mtierney@tierneylawrence.com

eramey@tierneylawrence.com

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:

Jason R. Dunn
David Meschke
Brownstein Hyatt Farber Schreck LLP
410 17th Street, #2200
Denver, CO 80202
Email: jdunn@bhfs.com
dmeschke@bhfs.com
Attorneys for Proponents

Matthew D. Grove, Esq.
Assistant Attorney General
Ralph L. Carr Colorado Judicial Center
1300 Broadway, 6th Floor
Denver, Colorado 80203
matt.grove@coag.gov
Attorneys for Title Board

s/Edward T. Ramey
Edward T. Ramey