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| <p>COLORADO SUPREME COURT<br/>Colorado State Judicial Building<br/>Two East 14th Avenue<br/>Denver, CO 80203</p>   |  |
| <p>Original Proceeding Pursuant to C.R.S. § 1-40-107(2)<br/>Appeal from the Colorado Ballot Title Setting Board</p> <p>In the Matter of the Title, Ballot Title, and Submission<br/>Clause for Proposed Initiatives 2017-2018 #119, #121,<br/>#122, and #123</p>   | <p>▲ COURT USE ONLY ▲</p>  |
| <p><b>Petitioner:</b><br/>Deborah Farrell</p> <p>v.</p> <p><b>Respondents:</b><br/>David Silverstein and Andrew Graham</p> <p>and</p> <p><b>Colorado Ballot Title Setting Board:</b><br/>Suzanne Staiert, Jason Gelender, and Glenn Roper</p>  | <p>Case Nos.: 2018SA48,<br/>2018SA49, and 2018SA50,<br/>and 2018SA51</p> |
| <p><b><i>Attorneys for Petitioner Deborah Farrell:</i></b></p> <p>Thomas M. Rogers III, #28809<br/>Dietrich C. Hoefner, #46304<br/>LEWIS ROCA ROTHGERBER CHRISTIE LLP<br/>1200 Seventeenth Street, Suite 3000<br/>Denver, CO 80202<br/>Phone: 303.623.9000<br/>Fax: 303.623.9222<br/>Email: trogers@lrrc.com<br/>dhoefner@lrrc.com</p> |  |
| <p><b>UNOPPOSED MOTION TO CONSOLIDATE CASE NOS. 2018SA48,<br/>2018SA49, 2018SA50, 2018SA51</b></p>   |  |

Petitioner Deborah Farrell, by and through undersigned counsel, hereby submits this Unopposed Motion to Consolidate Case Nos. 2018SA48, 2018SA49, 2018SA50, 2018SA51 and states:

1. These matters are before the Court on petitions filed by Petitioner to review the actions of the Title Board with respect to the setting of the title and submission clause for Initiatives 2017-2018 #119, #121, #122, and #123 (the “Initiatives”).

2. The Initiatives are similar in nature and present similar legal issues. Initiatives #121 and #123 are both omnibus measures that would each regulate health insurance carriers, pharmacies, and healthcare providers. Initiatives #119 and #120 each cover a subset of the omnibus measures, and would focus on health insurance carriers and healthcare providers, respectively.

3. Counsel for Petitioner has conferred with counsel for Respondents David Silverstein and Andrew Graham and counsel for the Title Board regarding this Motion. Counsel for all parties agree that these cases should be consolidated for the sake of judicial efficiency.

4. Petitioner therefore respectfully moves that the Court consolidate Case Nos. 2018SA48, 2018SA49, 2018SA50, 2018SA51.

Respectfully submitted this 5th day of March, 2018.

*s/ Thomas M. Rogers III*

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Thomas M. Rogers III

Dietrich C. Hoefner

LEWIS ROCA ROTHGERBER CHRISTIE LLP

*Attorneys for Petitioner Deborah Farrell*

## CERTIFICATE OF SERVICE

I hereby certify that on March 5, 2018, I electronically filed a true and correct copy of the foregoing UNOPPOSED MOTION TO CONSOLIDATE CASE NOS. 2018SA48, 2018SA49, 2018SA50, 2018SA51 with the clerk of Court via the Colorado Courts E-Filing system and served the same via email on the following:

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*s/ Robin Newcomer*

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