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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA,  
MISSOULA DIVISION

MONTANA MEDICAL ASSOCIATION, ET. AL.,

*Plaintiffs,*

and

MONTANA NURSES ASSOCIATION,

*Plaintiff-Intervenors,*

v.

AUSTIN KNUDSEN, ET AL.,

*Defendants.*

No. CV-21-108-M-DWM

**DEFENDANTS' MOTION IN  
LIMINE TO LIMIT THE  
TESTIMONY OF  
DR. DAVID TAYLOR**

Defendants move the Court in limine to exclude parts of the opinions of Plaintiffs' expert Dr. David Taylor. Portions of his opinion are unreliable and unhelpful to this case. Other parts improperly offer conclusions of law. Defendants request the Court exclude limit Taylor's testimony and exclude at least paragraphs 23, 24, 55, and 56 of his expert report. Additionally, the Court should either exclude or limit testimony as to the opinion expressed in paragraph 49 of his expert report.

This motion is supported by the accompanying brief, the Foundational Declaration of Brent Mead, and that declaration's exhibit 4.

Counsel for Plaintiffs and Plaintiff-Intervenor have been contacted and they oppose this motion.

DATED this 2nd day of September, 2022.

Austin Knudsen  
Montana Attorney General

DAVID M.S. DEWHIRST  
Solicitor General

*/s/Brent Mead*

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**CERTIFICATE OF SERVICE**

I certify that on this date, an accurate copy of the foregoing document was served electronically through the Court's CM/ECF system on registered counsel.

Dated: September 2, 2022

/s/ Brent Mead  
BRENT MEAD