

Daniel & Val O'Connell  
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 Cayucos, CA. 93430  
 406-577-6339

**MONTANA SIXTH JUDICIAL DISTRICT COURT, PARK COUNTY**

Daniel K. O'Connell & Valery A. O'Connell	)	
& on behalf of themselves as members of	)	
Glastonbury Landowners Association.	)	Cause No. DV-11-114
	)	
Plaintiff(s),	)	
	)	<b>PLAINTIFFS' MOTION FOR</b>
v.	)	<b>CHANGE OF VENUE</b>
	)	
Glastonbury Landowners Association, Inc.	)	
& current GLA Board of Directors	)	
	)	
Defendant(s)	)	
_____	)	

Plaintiff members, Daniel and Valery O'Connell, hereby file this motion for change of venue, pursuant to MCA§25-2-201, et al. This motion for venue change is for "the convenience of witnesses and the ends of justice would be promoted by the change" and other reasons. Plaintiffs did not yet receive answer from Defendants regarding this venue change.

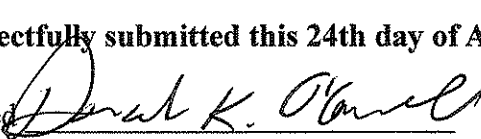
**FATUAL ARGUMENTS AND BRIEF IN SUPPORT**

The reasons for substitution of judge no longer exist when Judge Swandal retired. However, Plaintiffs' past substitution request was for a local judge not one hundreds of miles away in Plentywood. Plaintiffs feel that there is reason to believe that "an impartial trial cannot be had therein" for such bias and prejudice shown so far against Plaintiffs and also Plentywood being a small hometown of Plaintiffs' former council Hertha Lund, her family and friends.

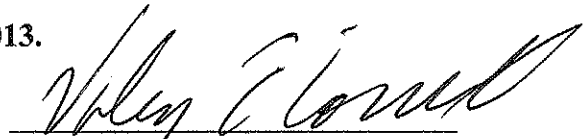
Overall, justice is served to grant this motion for venue change to save litigation time and expense for all parties by allowing for the consolidation of pleadings, hearings, and witnesses into the pending Park County case, as allowed because the parties are the same, with similar liabilities. Such savings of costs, time and convenience of witnesses and all parties is obvious since most reside in Park County. Venue change to Park County would thus allow the same witnesses and hearings to be held by a local judge, or combined into one hearing, or joinder of cases in Park County: all of which reduces courts time and avoids more expenses incurred upon all parties.

Respectfully submitted this 24th day of April, 2013.

Signed

  
Daniel O'Connell

Signed:

  
Valery O'Connell

#### Certificate of Service

A true and correct copy of forgoing document(s) were sent to the following parties via first class mail on this same day to:

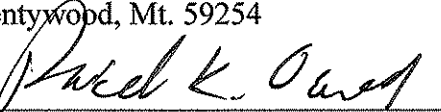
Sixth Judicial District Clerk of Court  
414 E. Callender St.  
Livingston, Mt. 59047

Alanah Griffith  
1184 N. 15th St. Suite #4  
Bozeman, Mt. 59715

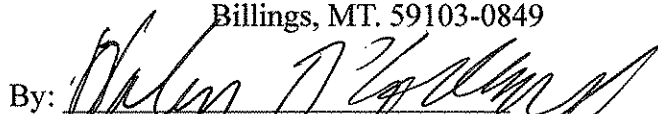
Hon. Judge David Cybulski  
573 Shippe Canyon Rd.  
Plentywood, Mt. 59254

Brown Law Firm, P.C.  
315 N. 24th St. (PO Drawer 849)  
Billings, MT. 59103-0849

By

  
Daniel O'Connell

By

  
Valery O'Connell