CIVIL

Pre-Trial Decision

21. **Consolidation**

The decision to grant or deny a motion for consolidation rests within the discretion of the district court, and will not be overturned absent a clear abuse of discretion. ***Tribby v. N.W. Bank of Great Falls***, 217 Mont. 196, 208, 704 P.2d 409 (1985). *See also* ***In re Estate of McDermott***, 2002 MT 164, ¶ 14, 310 Mont. 435, 51 P.3d 486; ***Envt'l Contractors, LLC v. Moon***, 1999 MT 178, ¶ 32, 295 Mont. 268, 983 P.2d 390; *contra* ***Yellowstone County v. Drew***, 2007 MT 130, ¶ 11, 337 Mont. 346, 160 P.3d 557 (applying de novo standard to review of interpretation and application of procedural rules).