

**FILED**  
**07-09-2021**  
**CLERK OF WISCONSIN**  
**COURT OF APPEALS**

**Appeal No. 2021AP000218**

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**STATE OF WISCONSIN**  
**COURT OF APPEALS**  
**DISTRICT II**

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TOWN OF BROOKFIELD,  
Plaintiff-Respondent,

-vs.-

MARTIN M. GONZALEZ,  
Defendant-Appellant.

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**MOTION FOR ADMISSION *PRO HAC VICE* OF**  
**SARAH H. LUDINGTON**

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Pursuant to SCR 10.03(4)(b), Matthew S. Pinix files this motion for admission *pro hac vice* of nonresident counsel, Sarah H. Ludington, and states as follows:

1. Matthew S. Pinix is an active member, in good standing, of the State Bar of Wisconsin and agrees to associate with Sarah H. Ludington in the above captioned case.

2. Sarah H. Ludington is a member in good standing of the Bar of the highest court of the state of North Carolina, where Applicant regularly practices law.

3. Attorney Ludington is admitted in the following courts:

State of North Carolina (NC Bar No. 19997, admitted:  
8/20/1993 );

District of Columbia (DC Bar No. 444411, admitted:  
12/2/1994);

Fourth Circuit Court of Appeals (admitted: 7/24/2020).

4. Attorney Ludington has complied with SCR Rule 10.03(4) governing *pro hac vice* admissions and submitted her Application for *Pro Hac Vice* admission to the State Bar of Wisconsin on May 24, 2021. Attorney Ludington's original Application for Pro Hac Vice Admission and proof of payment is attached here to as Exhibit A.

5. Attorney Ludington is the Director of the First Amendment Clinic at Duke University School of Law, a clinic with significant

expertise in the issues before the Court in this case. The First Amendment Clinic is located at 210 Science Drive, Durham, NC, 27708.

6. The public mission of the First Amendment Clinic at Duke Law is to protect and advance the freedoms of speech, press, assembly, and petition. The clinic advises and represents individuals and groups with First Amendment concerns or claims who cannot afford the assistance of lawyers with specialized First Amendment expertise. The clinic also provides commentary and legal analysis on pending or enacted legislation that implicates First Amendment freedoms, and other governmental as well as academic developments.

WHEREFORE, for the reasons set forth above and in the attached exhibit, counsel respectfully requests that this Court grant attorney Luddington's Motion for Admission *Pro Hac Vice* in this matter.

I, Matthew S. Pinix, Wisconsin counsel, have read the out-of-state attorney's Application for Admission Pro Hac Vice, have made a reasonable inquiry concerning the averments made therein, believe the out of state attorney's representations are true, and agree to ensure that the procedures of SCR Rule 10.03(4) are followed.

Respectfully submitted this 9<sup>th</sup> day of July, 2021.

PINIX LAW, LLC

Electronically signed by Matthew S. Pinix

Matthew S. Pinix, SBN 1064368

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Milwaukee, Wisconsin 53211

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### CERTIFICATION

I certify that a copy of this motion has been electronically filed with the Court and served on all parties by the same method on this 9<sup>th</sup> day of July as follows:

Town of Brookfield  
James W. Hammes  
Cramer, Multhauf & Hammes, LLP  
1601 E Racine Ave, Ste 200; PO Box 558  
Waukesha, WI 53187-0558  
*Attorney for the Plaintiff-Respondent*

Daniel M. Adams  
1200 East Capitol Drive, Suite 360  
Milwaukee, WI 53211  
*Attorney for Defendant-Appellant*

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**STATE OF WISCONSIN, CIRCUIT COURT,** Waukesha**COUNTY**Case Caption: TOWN OF BROOKFIELD vs. MARTIN  
M. GONZALEZ**Application for  
Pro Hac Vice Admission**

Case No. 2021AP000218CR

**I DECLARE UNDER PENALTY OF PERJURY:**

1. That I seek to appear pro hac vice in order to represent  
Amicus Curiae First Amendment Clinic at Duke Law  
in the above-captioned matter;
2. That I am admitted to practice law in the highest court(s) of the state(s) or country(ies) of;  
North Carolina
3. That there are no disciplinary complaints filed against me for violation of the rules of those  
courts (if so, please explain):
4. That I am not suspended or disbarred from practice for disciplinary reasons or reason of  
medical incapacity in any jurisdiction (if yes, please explain):
5. That I am associated with Attorney Atty. Matthew S. Pinix, State Bar No. 1064368  
an active member of the State Bar of Wisconsin (name the member of the State Bar of  
Wisconsin and provide his/her Member Number);
6. That I do not practice or hold out to practice law in the State of Wisconsin;
7. That I acknowledge the jurisdiction of the courts of the State of Wisconsin over my  
professional conduct, and I agree to abide by the rules of the relevant division of the Circuit  
Court of the State of Wisconsin, the Wisconsin Court of Appeals, the Wisconsin Supreme  
Court, and the Rules of Professional Conduct for Attorneys, if I am admitted pro hac vice;
8. That I have complied fully with SCR Rule 10.03 (4);
9. That I am applying for admission pro hac vice for the following reasons:  
in order to file a non-party amicus curiae brief in support of Defendant-Appellant Martin M. Gonzalez in the  
Wisconsin Court of Appeals, appeal no 2021AP000218-CR.

**Exhibit A**

I have applied for admission pro hac vice in the courts of the State of Wisconsin 0 previously in this calendar year.

I attach hereto evidence of my payment or prior payment of the pro hac vice fee.

Signature of Attorney s/Sarah Ludington 5/24/2021 2:17:58 PM	Telephone Number 919-613-7048
Name Printed Ms. Sarah Ludington	Email Address (if any) ludington@law.duke.edu
Address of Principal Office 210 Science Drive, Durham, NC, 27708, United States	



## Receipt:

Name on the card: Melynn Glusman

Payment Total: \$250.00

Payment Date: 5/24/2021 2:17:58 PM

Payment Method: Card ending with: \*0863

Transaction Number: AA0E4E490330