

FILED  
10-18-2023  
CLERK OF WISCONSIN  
SUPREME COURT

STATE OF WISCONSIN  
IN SUPREME COURT

No. 2023AP1399-OA

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REBECCA CLARKE, RUBEN ANTHONY, TERRY  
DAWSON, DANA GLASSTEIN, ANN GROVES-LLOYD,  
CARL HUJET, JERRY IVERSON, TIA JOHNSON, ANGIE  
KIRST, SELIKA LAWTON, FABIAN MALDONADO,  
ANNEMARIE MCCLELLAN, JAMES MCNETT,  
BRITTANY MURIELLO, ELA JOOSTEN (PARI) SCHILS,  
NATHANIEL SLACK, MARY SMITH-JOHNSON, DENISE  
SWEET, and GABRIELLE YOUNG,

Petitioners,

GOVERNOR TONY EVERS, in his official capacity;  
NATHAN ATKINSON, STEPHEN JOSEPH WRIGHT,  
GARY KRENZ, SARAH J. HAMILTON, JEAN-LUC  
THIFFEAULT, SOMESH JHA, JOANNE KANE and LEAH  
DUDLEY,

Intervenors-Petitioners,

v.

WISCONSIN ELECTIONS COMMISSION; DON MILLIS,  
ROBERT F. SPINDELL, JR., MARK L. THOMSEN, ANN S.  
JACOBS, MARGE BOSTELMANN, JOSEPH J.  
CZARNEZKI, in their official capacities as Members of the  
Wisconsin Election Commission; MEAGAN WOLFE, in her  
official capacity as the Administrator of the Wisconsin  
Elections Commission; ANDRE JACQUE, TIM  
CARPENTER, ROB HUTTON, CHRIS LARSON, DEVIN  
LEMAHIEU, STEPHEN L. NASS, JOHN JAGLER, MARK  
SPREITZER, HOWARD MARKLEIN, RACHAEL CABRAL-  
GUEVARA, VAN H. WANGGAARD, JESSE L. JAMES,  
ROMAINE ROBERT QUINN, DIANNE H. HESSELBEIN,  
CORY TOMCZYK, JEFF SMITH and CHRIS KAPENGA, in  
their official capacities as Members of the Wisconsin Senate.

Respondents,

WISCONSIN LEGISLATURE; BILLIE JOHNSON,  
CHRIS GOEBEL, ED PERKINS, ERIC O'KEEFE,  
JOE SANFELIPPO, TERRY MOULTON, ROBERT  
JENSEN, RON ZAHN, RUTH ELMER  
and RUTH STRECK,

Intervenor-Respondents.

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**MOTION TO ADMIT NON-RESIDENT ATTORNEYS  
PRO HAC VICE**

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Intervenors-Petitioner Governor Tony Evers, by undersigned counsel, hereby moves the Court for an Order permitting Attorneys Dax. L. Goldstein, John B. Hill, and Christine P. Sun, to appear pro hac vice in the Court and participate in this action on the Governor's behalf together with below-signed counsel.

This motion is brought pursuant to Wisconsin Supreme Court Rule 10.03(4) and is supported by the attached Applications for Admission Pro Hac Vice, which were submitted to the State Bar of Wisconsin along with the application fees on October 13, 2023 (Christine P. Sun), and October 16, 2023 (Dax L. Goldstein and John B. Hill).

WHEREFORE, we respectfully request that the Court grant this motion and permit Attorneys Dax. L. Goldstein, John B. Hill, and Christine P. Sun, nonresident attorneys, to appear before this Court in this matter on behalf of Intervenor-Petitioner Governor Tony Evers.

Dated this 18th day of October 2023.

Respectfully submitted,

JOSHUA L. KAUL  
Attorney General of Wisconsin

Electronically signed by:

Anthony D. Russomanno  
ANTHONY D. RUSSOMANNO  
Assistant Attorney General  
State Bar #1076050

FAYE B. HIPSMAN  
Assistant Attorney General  
State Bar #1123933

BRIAN P. KEENAN  
Assistant Attorney General  
State Bar #1056525

Wisconsin Department of Justice  
Post Office Box 7857  
Madison, Wisconsin 53707-7857  
(608) 267-2238 (ADR)  
(608) 264-9487 (FBH)  
(608) 266-0020 (BPK)  
(608) 294-2907 (Fax)  
russomannoad@doj.state.wi.us  
hipsmanfb@doj.state.wi.us  
keenanbp@doj.state.wi.us

MEL BARNES  
State Bar #1096012  
Office of Governor Tony Evers  
Post Office Box 7863  
Madison, Wisconsin 53707-7863  
(608) 266-1212  
mel.barnes@wisconsin.gov

Attorneys for Governor Tony Evers



506 S Spring St, #13308  
Los Angeles, CA 90013  
(202) 999-9305  
christine@statesuniteddemocracy.org

Wisconsin Supreme Court  
16 East State Capitol  
Madison, WI 53701

To Whom It May Concern,

I am writing you this letter to notify you of a change in my mailing address listed on my Application for Pro Hac Vice Admission with the State Bar of Wisconsin. My address listed on the Application for Hac Vice Admission is:

Christine P. Sun  
States United Democracy Center  
3749 Buchanan St.  
No. 475165  
San Francisco, CA 94147

The new address is:  
Christine P. Sun  
States United Democracy Center  
506 S Spring St #13308  
Los Angeles, CA 90013

In addition, please note that I am associated with Attorney Anthony David Russomanno, State Bar No. 1076050.

Warm regards,

A handwritten signature in blue ink, appearing to read "Christine P. Sun", is written in a cursive style.

Christine P. Sun

**STATE OF WISCONSIN, CIRCUIT COURT,** Supreme Court of Wisconsin **COUNTY**

Case Caption: REBECCA CLARKE, RUBEN  
ANTHONY, TERRY DAWSON, DANA  
GLASSTEIN, ANN GROVES-LLOYD,  
CARL HUJET, JERRY IVERSON, TIA  
JOHNSON, ANGIE KIBST, CELIKA

**Application for  
Pro Hac Vice Admission**

Case No. 2023AP001399OA

**I DECLARE UNDER PENALTY OF PERJURY:**

1. That I seek to appear pro hac vice in order to represent  
Governor Tony Evers  
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;  
California, New York, Tennessee (inactive) and U.S. Supreme Court
3. That there are no disciplinary complaints filed against me for violation of the rules of those  
courts (if so, please explain):  
There are not
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):  
I am not
5. That I am associated with Attorney Atty. Mel Barnes , State Bar No. 1096012  
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:  
To participate as counsel in this proceeding.

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

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

|   |   |
|---|---|
| Signature of Attorney<br>Christine Sun      10/13/2023 1:31:44 PM                   | Telephone Number<br>615-574-9108                              |
| Name Printed<br>Ms. Christine Sun   | Email Address (if any)<br>christine@statesuniteddemocracy.org |
| Address of Principal Office<br>3749 Buchanan St, San Francisco, CA, 94147-3103, USA |   |



**STATE BAR  
OF WISCONSIN**

## Receipt:

Name on the card: Jennifer Fogel-Bublick

Payment Total: \$250.00

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**STATE OF WISCONSIN, CIRCUIT COURT,** Supreme Court of Wisconsin **COUNTY**

Case Caption: CLARKE, et al. v. WISCONSIN  
ELECTIONS COMMISSION, et al.

**Application for  
Pro Hac Vice Admission**

Case No. 2023AP001399OA

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2. That I am admitted to practice law in the highest court(s) of the state(s) or country(ies) of;  
California
3. That there are no disciplinary complaints filed against me for violation of the rules of those  
courts (if so, please explain):  
There are not
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):  
I am not
5. That I am associated with Attorney Atty. Anthony David Russomanno, State Bar No. 1076050  
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:  
To participate as co-counsel in this proceeding.



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

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

|   |   |
|---|---|
| Signature of Attorney<br>Dax Luce Goldstein      10/16/2023 1:55:29 PM      | Telephone Number<br>415-938-6481                        |
| Name Printed<br>Atty. Dax Luce Goldstein                                    | Email Address (if any)<br>dax@statesuniteddemocracy.org |
| Address of Principal Office<br>506 S Spring St, Los Angeles, CA, 90013, USA |   |



**STATE BAR  
OF WISCONSIN**

## Receipt:

Name on the card: Dax Goldstein

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**STATE OF WISCONSIN, CIRCUIT COURT,** Supreme Court of Wisconsin **COUNTY**

Case Caption: CLARKE, et al. v. WISCONSIN  
ELECTIONS COMMISSION, et al.

**Application for  
Pro Hac Vice Admission**

Case No. 2023AP001399OA

**I DECLARE UNDER PENALTY OF PERJURY:**

1. That I seek to appear pro hac vice in order to represent  
GOVERNOR TONY EVERS  
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;  
Pennsylvania; New York
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. Anthony David Russomanno, State Bar No. 1076050  
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;
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To participate as co-counsel in this proceeding.

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<br>John B. Hill      10/16/2023 12:51:51 PM           | Telephone Number<br>202-999-9305                         |
| Name Printed<br>John B. Hill  | Email Address (if any)<br>john@statesuniteddemocracy.org |
| Address of Principal Office<br>250 Commons Dr, Du Bois, PA, 15801-3808, USA |  |



**STATE BAR  
OF WISCONSIN**

## Receipt:

Name on the card: John Hill

Payment Total: \$250.00

Payment Date: 10/16/2023 12:51:51 PM

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