

FILED
10-18-2023
CLERK OF WISCONSIN
SUPREME COURT

STATE OF WISCONSIN
IN SUPREME COURT

No. 2023AP1399-OA

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.

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

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
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(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 Christine Sun 10/13/2023 1:31:44 PM	Telephone Number 615-574-9108
Name Printed Ms. Christine Sun	Email Address (if any) christine@statesuniteddemocracy.org
Address of Principal Office 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

Payment Date: 10/13/2023 1:31:44 PM

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Transaction Number: AK3EA5E659C5

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



**STATE BAR
OF WISCONSIN**

Receipt:

Name on the card: Dax Goldstein

Payment Total: \$250.00

Payment Date: 10/16/2023 1:55:29 PM

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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;
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 John B. Hill 10/16/2023 12:51:51 PM	Telephone Number 202-999-9305
Name Printed John B. Hill	Email Address (if any) john@statesuniteddemocracy.org
Address of Principal Office 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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