

**FILED**  
**11-13-2023**  
**CLERK OF WISCONSIN**  
**SUPREME COURT**

# Supreme Court of Wisconsin

NO. 2023AP001399 - 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,

vs.

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,

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**MOTION FOR ADMISSION PRO HAC VICE OF  
ATTORNEY ABHA KHANNA**

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DEVIN LEMAHIEU, STEPHEN L. NASS, JOHN JAGLER,  
MARK SPREITZER, HOWARD MARKLEIN, RACHAEL  
CABRALGUEVARA, 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,

Intervenors-Respondents

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I, Samuel Ward-Packard, a member in good standing with the State Bar of Wisconsin, respectfully move the Court for an order allowing the admission *pro hac vice* of Attorney Abha Khanna of Elias Law Group LLP, in the above-captioned matter, pursuant to SCR 10.03(4)(b).

The grounds for this motion are as follows:

- 1) Pursuant to SCR 10.03(4)(b), a court or judge in this state may allow nonresident counsel to appear and participate in a particular action or proceeding in association with an active

member of the State Bar of Wisconsin who appears and participates in the action or proceeding.

2) Attorney Khanna is a partner at my law firm, Elias Law Group LLP, and a member in good standing of the New York State Bar Association and the Washington State Bar Association. I am an active member in good standing of the Wisconsin Bar, and Attorney Khanna will appear in this matter in coordination with me.

3) The information required to be submitted with the motion, including the application for *pro hac vice* admission and associated documents, are attached hereto.

4) Attorney Khanna has satisfied the criteria and required procedural prerequisites for *pro hac vice* admission, including payment of all required fees.

WHEREFORE, I respectfully request that this Court grant the motion to admit Attorney Khanna *pro hac vice* for participation in this matter.

Dated: November 13, 2023

Respectfully submitted,

*Electronically signed by*  
*Samuel T. Ward-Packard*  
Samuel T. Ward-Packard  
State Bar No. 1128890  
ELIAS LAW GROUP LLP  
250 Mass. Ave NW,  
Suite 400  
Washington, D.C. 20001  
swardpackard@elias.law

*Attorneys for proposed*  
*Amici Curiae Jo Ellen*  
*Burke, Jennie Tunkieicz,*  
*and John Persa*

**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  
proposed Amici Curiae Jo Ellen Burke, Jennie Tunkieicz, and John Persa  
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;  
Washington State, 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. Samuel Tucker Ward-Packar, State Bar No. 1128890  
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 represent proposed Amici Curiae Jo Ellen Burke, Jennie Tunkieicz, and John Persa

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.

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|---|---|
| Signature of Attorney<br>/s/ Abha Khanna      11/9/2023 7:06:11 PM            | Telephone Number<br>206-656-0177            |
| Name Printed<br>Ms. Abha Khanna   | Email Address (if any)<br>akhanna@elias.law |
| Address of Principal Office<br>1700 Seventh Ave, Seattle, WA, 98101-1360, USA |   |



**STATE BAR  
OF WISCONSIN**

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