

FILED

11-20-2023

CLERK OF WISCONSIN

SUPREME COURT

## IN THE SUPREME COURT OF WISCONSIN

No. 2023AP1399

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, CARRIE RIEPL, IN THEIR OFFICIAL CAPACITIES AS  
MEMBERS OF THE WISCONSIN ELECTIONS 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,

*Intervenors-Respondents.*

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**MOTION FOR PRO HAC VICE ADMISSION**

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TO THE HONORABLE COURT:

I, Jonathan B. Miller, move the Court for permission to appear before the Court *pro hac vice*, under SCR 10.03(4)(c) or (cm), as attorney for *Amici Curiae*, and would show the Court the following:

1. My Application as Submitted to the Wisconsin State Bar is attached as **Exhibit A**.
2. Proof of payment is attached as **Exhibit B**.

For these reasons, I ask this Court to grant my Motion for *Pro Hac Vice* Admission and allow me to appear before this Court in this proceeding until the conclusion of this case.

Respectfully submitted,

By: electronically signed by Jonathan Miller  
Jonathan Miller  
jon@publicrightsproject.org  
PUBLIC RIGHTS PROJECT  
490 43rd Street, Unit #115  
Oakland, CA 94609  
Tel. 646-831-6113  
*Counsel for Amici Curiae*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the forgoing document was filed electronically with the Court's electronic filing system on November 20, 2023. Service will be effectuated by the Court's electronic notification system upon all parties and counsel of record.

By: *electronically signed by Nicholas E. Fairweather*

NICHOLAS E. FAIRWEATHER

Wisconsin State Bar No.: 1036681

HAWKS QUINDEL, S.C.

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# EXHIBIT A

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

Case Caption: REBECCA CLARKE, RUBEN  
ANTHONY, TERRY DAWSON, DANA  
GLASSTEIN, ANN GROVESLLOYD,  
CARL HUJET, JERRY IVERSON, TIA  
JOHNSON, ANDIE KIRST, CELIKA

**Application for  
Pro Hac Vice Admission**

Case No. 2023AP001399

**I DECLARE UNDER PENALTY OF PERJURY:**

1. That I seek to appear pro hac vice in order to represent  
local elected officials in Wisconsin  
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;  
Commonwealth of Massachusetts (Bar No.: 663012), New York (Bar No.: 4374112)
3. That there are no disciplinary complaints filed against me for violation of the rules of those  
courts (if so, please explain):  
N/A
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):  
N/A
5. That I am associated with Attorney Atty. Nicholas E. Fairweather, State Bar No. 1036681  
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:  
I seek to represent local elected officials in Wisconsin as amicus curiae in the above-listed  
matter.

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 Jonathan Miller      11/8/2023 2:59:54 PM	Telephone Number 646-831-6113
Name Printed Jonathan Miller	Email Address (if any) jon@publicrightsproject.org
Address of Principal Office 490 43rd Street, Oakland, CA, 94609, United States	

# **EXHIBIT B**



## Receipt:

Name on the card: Jonathan Miller

Payment Total: \$250.00

Payment Date: 11/8/2023 2:59:54 PM

Payment Method: Card ending with: \*8025

Transaction Number: AA1E7B169893