

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.

MOTION FOR PRO HAC VICE ADMISSION

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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Madison, Wisconsin 53701-2155
Telephone: (608) 257-0040
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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, ANGLIE KIBST, 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 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