

**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, Michael Adame, 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 Michael Adame*

Michael Adame

michael@publicrightsproject.org

PUBLIC RIGHTS PROJECT

490 43rd Street, Unit #115

Oakland, CA 94609

Tel. 949-705-8950

*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  
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409 East Main Street  
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# **EXHIBIT A**

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**IN THE SUPREME COURT OF WISCONSIN**

No. 2023AP1399

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REBECCA CLARKE, RUBEN ANTHONY, TERRY DAWSON, DANA GLASSTEIN, ANN GROVESLLOYD, 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 (DEE) 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, AND JOSEPH J. CZARNEZKI, 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; SENATOR ANDRÉ JACQUE, SENATOR TIM CARPENTER, SENATOR ROB HUTTON, SENATOR CHRIS LARSON, SENATOR DEVIN LEMAHIEU, SENATOR STEPHEN L. NASS, SENATOR JOHN JAGLER, SENATOR MARK SPREITZER, SENATOR HOWARD L. MARKLEIN, SENATOR RACHAEL CABRAL-GUEVARA, SENATOR VAN H. WANGGAARD, SENATOR JESSE L. JAMES, SENATOR ROMAINE ROBERT QUINN, SENATOR DIANNE H. HESSELBEIN, SENATOR CORY TOMCZYK, SENATOR JEFF SMITH, AND SENATOR 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 SANFELLIPO, TERRY MOULTON, ROBERT JENSEN, RON ZAHN, RUTH ELMER, AND RUTH STRECK,  
Intervenors-Respondents.

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**APPLICATION FOR ADMISSION PRO HAC VICE UNDER SCR 10.03(4)(b)**

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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 Washington, D.C.(Bar Number: 1658371), California (Bar Number: 324664);
3. That I am admitted to practice law before the court(s) of the following federally recognized Indian tribes: 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 Atty. Nicholas E. Fairweather, State Bar No. 1036681, an active member of the State Bar of Wisconsin;
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 the requirements of 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 times previously in this calendar year.

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

Signature: /s/ Michael Adame

Print Name: Michael Adame

Date: November 14th, 2023

Address: 490 43rd Street Unit #115, Oakland, CA 94609

Telephone Number: 949-705-8950

Email Address: michael@[publicrightsproject.org](mailto:michael@publicrightsproject.org)

# **EXHIBIT B**





Christina Schuler da Costa Ferro &lt;christina@publicrightsproject.org&gt;

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**Receipt for Transaction Number: 2469849**

1 message

**State Bar of Wisconsin Help Desk** <help@wisbar.org>

Tue, Nov 14, 2023 at 11:13 AM

Reply-To: help@wisbar.org

To: christina@publicrightsproject.org

The following is your receipt for Transaction Number: 2469849

SBW ID: 1136281

SBW Name: Michael Adame

Transaction Date: 11/09/2023

Transaction Details:

- 1 (\$25.00) Pro Hac Vice Fee - OLR
- 2 (\$100.00) Pro Hac Vice Fee - ATJ
- 3 (\$100.00) Pro Hac Vice Fee - WISTAF
- 4 (\$25.00) Pro Hac Vice Fee - SBW
- 5 \$250.00 Total Due

**Additional Information On Demand and Electronic Products:** To access your electronic products in the future, navigate to your [myStateBar](#) page on WisBar.org. Once there, you will find these products in separate categories under the myMedia tab. **Telephone Seminars:** Instructions on how to access the seminar and links to the course materials will be sent to your email address on file, on the day before the scheduled Telephone Seminar. **Webcast Seminars:** Before the scheduled Webcast date, please [test your system](#) to ensure that you will be able to view the Webcast. To access the Webcast and course materials, [navigate to your myMedia page](#) on WisBar. Reminders for Webcast Seminars will be sent out twice to your email inbox- one week before, and again, two days before the Webcast. To ensure you properly receive all instructions in your inbox (and not in bulk or junk folders), please add [seminars-mailbox@wisbar.org](mailto:seminars-mailbox@wisbar.org) to your list of Safe Senders. *This email message, including any files attached to it, is confidential and it is intended solely for the individual or entity to which it is addressed. If you have received this message in error, please do not read it, notify the sender by return email mail that you have received it, and delete all copies of this message from your email system.*