

**FILED**

OCT 07 2021

CLERK OF SUPREME COURT  
OF WISCONSIN

No. 2021AP1450-OA

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**IN THE SUPREME COURT OF WISCONSIN**

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BILLIE JOHNSON, ERIC O'KEEFE,  
ED PERKINS AND RONALD ZAHN,

*Petitioners,*

v.

WISCONSIN ELECTIONS COMMISSION, MARGE BOSTELMANN,  
JULIE GLANCEY, ANN JACOBS, DEAN KNUDSON,  
ROBERT SPINDELL, AND MARK THOMSEN,  
in their official capacities as members of  
the Wisconsin Election Commission,

*Respondents.*

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**MOTION FOR ADMISSION PRO HAC VICE  
OF ATTORNEYS JEFFREY M. HARRIS,  
TAYLOR A.R. MEEHAN, AND JAMES P. MCGLONE**

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I, Kevin M. St. John, a member of good standing with this Court, respectfully move for the admission *pro hac vice* of Attorneys Jeffrey M. Harris, Taylor A.R. Meehan, and James P. McGlone to represent the Wisconsin Legislature as a proposed intervenor in the above-captioned original action. In support of this motion, I represent as follows:

1. Attorneys Harris, Meehan, and McGlone are affiliated with my firm, Bell Giftos St. John LLC, in that we jointly provide legal services to the Wisconsin Legislature in this matter.

2. The Legislature has moved to intervene in the above-captioned matter so that it can participate as a full party.

3. Consistent with Wis. SCR 10.03(4)(b)1. and Appendix A-1 to Wis. SCR ch. 10, Attorneys Harris, Meehan, and McGlone have completed and submitted their *pro hac vice* applications to the State Bar of Wisconsin to represent the Wisconsin Legislature in this matter. Their applications are attached hereto as Exhibits A, B, and C, respectively, and the representations made therein are incorporated into this motion.

4. Attorneys Harris, Meehan, and McGlone included in their applications to the State Bar of Wisconsin fees required by Wis. SCR 10.03(4)(b)2 via credit card. Their respective applications, attached as Exhibits A, B, and C, each include proof of payment.

WHEREFORE, I respectfully request the Court grant this motion and permit Attorneys Harris, Meehan, and McGlone, all nonresident attorneys, to appear before this Court in this matter on behalf of the Proposed Intervenor-Defendant, the Wisconsin Legislature.

Dated this 7<sup>th</sup> day of October, 2021.

Respectfully submitted,

**BELL GIFTOS ST. JOHN LLC**



Kevin M. St. John, SBN 1054815  
5325 Wall Street, Suite 2200  
Madison, Wisconsin 53718  
608.216.7990  
*kstjohn@bellgiftos.com*

*Attorney for Proposed Intervenor-  
Defendant, the Wisconsin  
Legislature*