

**SUPREME COURT OF WISCONSIN**Appeal No. 2021AP001450 - OA

---

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

*Petitioners,*

BLACK LEADERS ORGANIZING FOR  
COMMUNITIES, VOCES DE LA FRONTERA,  
LEAGUE OF WOMEN VOTERS OF WISCONSIN,  
CINDY GALLONA, LAUREN STEPHENSON,  
REBECCA ALWIN, CONGRESSMAN GLENN  
GROTHMAN, CONGRESSMAN MIKE  
GALLAGHER, CONGRESSMAN BRYAN STEIL,  
CONGRESSMAN TOM TIFFANY,  
CONGRESSMAN SCOTT FITZGERALD, LISA  
HUNTER, JACOB SABEL, JENNIFER OH, JOHN  
PERSA, GERALDINE SCHERTZ, KATHLEEN  
QUALHEIM, GARY KRENZ, SARAH J.  
HAMILTON, STEPHEN JOSEPH WRIGHT, JEAN-  
LUC THIFFEAULT, and SOMESH JHA,

*Intervenors-Petitioners,*

v.

WISCONSIN ELECTIONS COMMISSION, MARGE  
BOSTELMANN in her official capacity as a member  
of the Wisconsin Elections Commission, ANN  
JACOBS, in her official capacity as a member of the  
Wisconsin Elections Commission, DEAN KNUDSON  
in his official capacity as a member of the Wisconsin  
Elections Commission, ROBERT SPINDELL, JR. in  
his official capacity as a member of the Wisconsin  
Elections Commission, and MARK THOMSEN in his  
official capacity as a member of the Wisconsin  
Elections Commission,

*Respondents,*

THE WISCONSIN LEGISLATURE, GOVERNOR  
TONY EVERS, in his official capacity, and JANET  
BEWLEY SENATE DEMOCRATIC MINORITY  
LEADER, on behalf of the SENATE DEMOCRATIC  
CAUCUS,

*Intervenors-Respondents.*

---

**MOTION FOR ADMISSION *PRO HAC VICE* OF  
NONRESIDENT ATTORNEY RUTH M. GREENWOOD**

---

Amici Curiae, William Whitford, Hans Breitenmoser, Mary Lynne Donohue, Wendy Sue Johnson, and Deborah Patel (collectively, “Amici Curiae”), by their attorneys, Hawks Quindel, S.C., move the Court for an order pursuant to SCR 10.03(4) allowing nonresident attorney Ruth M. Greenwood, of the Election Law Clinic at Harvard Law School, 6 Everett St, Suite 5112, Cambridge MA 02138, permission to appear and participate in this action as counsel for Amici Curiae. This motion is supported by the contemporaneously filed Affidavits of Jakob Feltham and Ruth M. Greenwood. In further support of this motion, Amici Curiae state as follows:

1. Attorney Greenwood is admitted to practice in Massachusetts, Illinois, and New York, and is a member in good standing of the Massachusetts, Illinois, and New York Bars, and will abide by the rules of this Court and the laws of the State of Wisconsin. (Affidavit of Ruth M.

Greenwood (“Greenwood Aff.”) ¶¶2, 6; Affidavit of Jakob Feltham (“Feltham Aff.”) ¶4.)

2. Attorney Greenwood has created an eCourts account, submitted an Application for admission *pro hac vice* to the State Bar of Wisconsin, and paid the online fee. (Greenwood Aff. ¶7, Ex. 1)

3. Attorney Greenwood serves as counsel for amici curiae, along with Attorney Jakob Feltham of Hawks Quindel, S.C. (Greenwood Aff. ¶¶1, 5; Feltham Aff. ¶¶2, 3.)

WHEREFORE, Amici Curiae William Whitford, Hans Breitenmoser, Mary Lynne Dononhue, Wendy Sue Johnson, and Deborah Patel respectfully request that their motion be granted and that the Court enter the proposed order submitted with this motion.

Dated: October 25, 2021

HAWKS QUINDEL

By: Electronically Signed by Jakob Feltham

Jakob Feltham

State Bar Number: 1097614

*Attorney for Amici Curiae*

*William Whitford, Hans*

*Breitenmoser, Mary Lynne*

*Dononhue, Wendy Sue Johnson,*

*and Deborah Patel.*

409 East Main St.  
Madison, WI 53703  
jfeltham@hq-law.com  
(608) 257-0040