

SUPREME COURT OF WISCONSINAppeal 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 JOPSEH 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.

**AFFIDAVIT OF RUTH M. GREENWOOD IN SUPPORT OF
MOTION FOR ADMISSION *PRO HAC VICE***

STATE OF MASSACHUSETTS)
 : SS
COUNTY OF SUFFOLK)

Ruth M. Greenwood, after being duly sworn, states:

1. I am the Director of the Election Law Clinic at Harvard Law School, 6 Everett St., Suite 5112, Cambridge MA 02138. I am serving as counsel for William Whitford, Hans Breitenmoser, Mary Lynne Dononhue, Wendy Sue Johnson, and Deborah Patel in this action, along with Hawks Quindel, S.C.

2. I admitted to practice law in the highest court of the Commonwealth of Massachusetts and the States of Illinois and New York. I have been a member in good standing of the Massachusetts Bar since 2021, of the Illinois Bar since 2013, and of the New York Bar since 2011. I have never been the subject of a disciplinary proceeding.

3. I am not a Wisconsin resident, nor am I regularly engaged in the practice of law or other business in Wisconsin.

4. I have not been denied admission to any state or federal court at any time.

5. The law firm of Hawks Quindel, S.C. has been retained by William Whitford, Hans Breitenmoser, Mary Lynne Dononhue, Wendy Sue Johnson, and Deborah Patel in this matter, and is serving as local counsel in this matter. Hawks Quindel, S.C. is located at 409 East Main St, Madison, WI 53703 and the phone number is (608) 257-0040.

6. I am familiar with the facts of this case and will, if permitted, participate in this action in accordance with the rules of professional conduct for attorneys, the rules of decorum of the Court, and the local rules of the Court.

7. On October 15, 2021, I created an eCourts account, and on October 18 I submitted an Application for admission *pro hac vice* to the State Bar of Wisconsin, and paid the online fee. True and correct copies of my Application for admission *pro hac vice* and proof of payment of the online fee are attached to this Affidavit as Exhibit 1.

Further, Affiant sayeth not.



Ruth M. Greenwood

Subscribed and sworn to before me this
21 day of October, 2021.



Notary Public, Commonwealth of Massachusetts
My commission expires: 03/04/2022



EDGAR KLEY FILHO
NOTARY PUBLIC
Commonwealth of Massachusetts
My Commission Expires
March 4, 2022

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behalf of the SENATE DEMOCRATIC CAUCUS

Intervenors-Respondents.

**AFFIDAVIT OF RUTH M. GREENWOOD IN SUPPORT OF
MOTION FOR ADMISSION *PRO HAC VICE***

EXHIBIT 1

Application for Admission and Proof of Payment of Online Fee

STATE OF WISCONSIN, CIRCUIT COURT, Supreme Court of Wisconsin	COUNTY
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Case Caption: BILLIE JOHNSON, ERIC O'KEEFE, ED
PERKINS, AND RONALD ZAHN,
Petitioners,
BLACK LEADERS ORGANIZING FOR
COMMUNITIES VOICES DELA

**Application for
Pro Hac Vice Admission**

Case No. 2021AP001450OA

I DECLARE UNDER PENALTY OF PERJURY:

1. That I seek to appear pro hac vice in order to represent
William Whitford, Hans Breitenmoser, Mary Lynne Dononhue, Wendy Sue Johnson, and Deborah Patel
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;
Massachusetts, Illinois, and New York
3. That there are no disciplinary complaints filed against me for violation of the rules of those
courts (if so, please explain):
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):
5. That I am associated with Attorney Atty. Jakob E. Feltham, State Bar No. 1097614
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:
so that I can submit an amicus brief on behalf of William Whitford, Hans Breitenmoser, Mary Lynne
Dononhue, Wendy Sue Johnson, and Deborah Patel in this 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 /s/ Ruth M. Greenwood 10/18/2021 12:36:19 PM	Telephone Number 617-998-1010
Name Printed Ms. Ruth M. Greenwood	Email Address (if any) rgreenwood@law.harvard.edu
Address of Principal Office 6 Everett St, Cambridge, MA, 02138-2701, USA	

**Receipt:**

Name on the card: Ms. Ruth M. Greenwood

Payment Total: \$250.00

Payment Date: 10/18/2021 12:36:19 PM

Payment Method: Card ending with: *6541

Transaction Number: AF1E4B208875