

SUPREME COURT OF WISCONSIN

Appeal No. 2021AP001450 - OA

BILLIE JOHNSON, et al.,

*Petitioners,*

v.

WISCONSIN ELECTIONS COMMISSION, et al.,

*Respondents.*

Original Action in the Wisconsin Supreme Court

**AFFIDAVIT OF SIMONE T. LEEPER IN SUPPORT OF  
MOTION FOR ADMISSION *PRO HAC VICE***

Texas  
STATE OF ~~DISTRICT OF COLUMBIA~~ )  
: SS  
COUNTY OF WASHINGTON ~~Dallas~~ )

Simone T. Leeper, after being duly sworn, states:

1. I am an attorney with the Campaign Legal Center, 1101 14th St. NW, Suite 400, Washington, DC 20005. I am serving as counsel for Black Leaders Organizing for Communities (“BLOC”), Voces de la Frontera (“Voces”), League of Women Voters of Wisconsin (“LWVWI”), Cindy Fallona, Lauren Stephenson, and Rebecca Alwin, in this action, along with Stafford Rosenbaum LLP and Law Forward, Inc.

2. I am admitted to practice law in the highest court of the District of Columbia. I have been a member in good standing of the District of Columbia Bar since 2021. 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 Stafford Rosenbaum LLP has been retained by Black Leaders Organizing for Communities (“BLOC”), Voces de la Frontera (“Voces”), League of Women Voters of Wisconsin (“LWVWI”), Cindy Fallona, Lauren Stephenson, Rebecca Alwin, and is serving as local counsel in this matter. Stafford Rosenbaum LLP is located at 222 West Washington Avenue, Suite 900, Madison, Wisconsin, 53703 and the phone number is (608) 256-0226.

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.

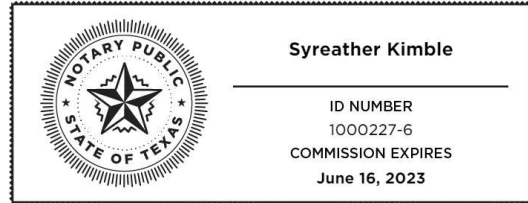
7. On November 16, 2021, I created an eCourts account, submitted an Application for admission *pro hac vice* to the State Bar of Wisconsin, and paid the online fee. Copies of my Application for admission *pro hac vice* and proof of payment of the online fee are attached to this Affidavit as Exhibit 1.

Further, Affiant sayeth not.

*Simone T. Leeper*

Simone T. Leeper

Subscribed and sworn to before me this  
fourteenth day of December, 2021.



*Syreather Kimble*

Notary Public, State of ~~District of Columbia~~ Texas

My commission expires: 06/16/2023

Notarized online using audio-video communication

# **EXHIBIT 1**

Case Caption: Billie Johnson, et al.

v.  
Wisconsin Elections Commission, et al.

**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  
Intervenors-Petitioners  
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;  
the District of Columbia and Florida.
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. Douglas M. Poland, State Bar No. 1055189  
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 I can represent the Intervenors-Petitioners; BLOC, Voces, LWVWI, Cindy Fallona, Lauren Stephenson,  
Rebecca Alwin, Congressman Glenn Grothman, Congressman Mike Gallagher, Congressman Bryan Steil,  
Congressman Tom Tiffany, Congressman Scott Fitzgerald, Lisa Hunter, Jacob Zabel, Jennifer Oh, John  
Persa, Geraldine Schertz, Kathleen Qualheim, Gary Krenz, Sarah J. Hamilton, Stephen Joseph Wright,  
Jean-Luc Thiffeault, and Somesh Jha (collectively, "Intervenors-Petitioners").

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<br>Simone T. Leeper      11/16/2021 2:49:49 PM                  | Telephone Number<br>202-650-5170                          |
| Name Printed<br>Atty. Simone T. Leeper  | Email Address (if any)<br>sleeper@campaignlegalcenter.org |
| Address of Principal Office<br>1101 14th St. NW, Washington, DC, 20005, United States |   |



STATE BAR  
OF WISCONSIN

## Receipt:

Name on the card: Atty. Simone T. Leeper

Payment Total: \$250.00

Payment Date: 11/16/2021 2:49:49 PM

Payment Method: Card ending with: \*9236

Transaction Number: AJ1E4B8EA0CE