

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

**MOTION FOR ADMISSION *PRO HAC VICE* OF
NONRESIDENT ATTORNEY MARK P. GABER**

Amici Curiae, Black Leaders Organizing for Communities (“BLOC”), Voces de la Frontera (“Voces”), League of Women Voters of Wisconsin (“LWVWI”), Cindy Fallona, Lauren Stephenson, Rebecca Alwin, Helen Harris, Woodrow Wilson Cain, II, Nina Cain, Tracie Y. Horton, Pastor Sean Tatum, Melody McCurtis, Barbara Toles, and Edward Wade, Jr. (collectively, “Amici Curiae”), by their attorneys, Stafford Rosenbaum LLP, move the Court for an order pursuant to SCR 10.03(4) allowing nonresident attorney Mark P. Gaber, of the Campaign Legal Center, 1101 14th St. NW, Ste. 400, Washington, DC 20005, permission to appear and participate in this action as counsel for Amici Curiae. This motion is supported by the contemporaneously filed Affidavits of Douglas M. Poland and Mark P. Gaber. In further support of this motion, Amici Curiae state as follows:

1. Attorney Gaber is admitted to practice in the District of Columbia and California (inactive), is a member in good standing of the District of Columbia and California Bars, and will abide by the rules of this Court and the laws of the State of Wisconsin. (Affidavit of Mark P. Gaber (“Gaber Aff.”) ¶¶2, 6; Affidavit of Douglas M. Poland (“Poland Aff.”) ¶4.)

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

3. Attorney Gaber serves as counsel for amici curiae, along with Attorneys Douglas M. Poland, Jeffrey A. Mandell, Rachel E. Snyder, and Richard A. Manthe of Stafford Rosenbaum LLP, Mel Barnes of Law Forward, Inc., and Annabelle Harless and Christopher Lamar of the Campaign Legal Center (Gaber Aff. ¶¶1, 5; Poland Aff. ¶¶2, 3.)

WHEREFORE, Amici Curiae BLOC, Voces, LWVWI, Cindy Fallona, Lauren Stephenson, Rebecca Alwin, Helen Harris, Woodrow Wilson Cain, II, Nina Cain, Tracie Y. Horton, Pastor Sean Tatum, Melody McCurtis, Barbara Toles, and Edward Wade, Jr. respectfully request that their motion be granted and that the Court enter the proposed order submitted with this motion.

Dated: September 20, 2021.

STAFFORD ROSENBAUM LLP

By: 

Douglas M. Poland

State Bar Number 1055189

*Attorneys for Amici Curiae BLOC, Voces,
LWWWI, Cindy Fallona, Lauren Stephenson,
Rebecca Alwin, Helen Harris, Woodrow Wilson
Cain, II, Nina Cain, Tracie Y. Horton, Pastor
Sean Tatum, Melody McCurtis, Barbara Toles,
and Edward Wade, Jr.*

222 West Washington Avenue
Suite 900
P.O. Box 1784
Madison, WI 53701-1784
dpoland@staffordlaw.com
608.259.2663