

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 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.

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