

JUL 30 2015

HEATHER L. SMITH
CLERK OF APPELLATE COURTS

IN THE SUPREME COURT OF THE STATE OF KANSAS

HODES & NAUSER, MDs, P.A.;)
HERBERT C. HODES, M.D.; and)
TRACI LYNN NAUSER, M.D.,)

Plaintiffs-Appellees,)

v.)

DEREK SCHMIDT, in his official)
capacity as Attorney General)
of the State of Kansas; and STEPHEN M.)
HOWE, in his official capacity as District)
Attorney for Johnson County,)

Defendants-Appellants.)

Appellate Court Case # 15-114153-A
Trial Court Case # 2015-CV-490, Div. 6



MOTION FOR ADMISSION PRO HAC VICE

(Pursuant to K.S.A. Chapter 60)

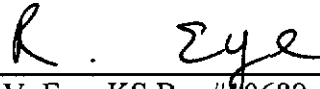
COMES NOW Bob Eye, an attorney of record in the above captioned case, and moves for the admission *pro hac vice* of Genevieve Scott. I am regularly engaged in the practice of law in Kansas, in good standing with the Kansas Supreme Court, and request the admission of Genevieve Scott, who is an attorney regularly engaged in the practice of law and in good standing in New York, pursuant to the rules of the highest appellate court in that jurisdiction.

I will be actively engaged in the conduct of this case; will sign all pleadings, documents, and briefs; and will be present at oral argument, if scheduled. I respectfully request the admission *pro hac vice* of Genevieve Scott to practice law in the district and appellate courts of Kansas for purposes of this case only.

Please find attached the verified application of Genevieve Scott and the **\$100.00** non-refundable fee.

Dated: July 30, 2015
Topeka, KS

Respectfully submitted,



Robert V. Eye, KS Bar #10689
Robert V. Eye Law Office, LLC
123 SE 6th Avenue, Suite 200
Topeka, KS 66603
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Attorney for Plaintiffs

IN THE SUPREME COURT OF THE STATE OF KANSAS

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TRACI LYNN NAUSER, M.D.,)	
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Plaintiffs-Appellees,)	Appellate Court Case # 15-114153-A
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DEREK SCHMIDT, in his official)	
capacity as Attorney General)	
of the State of Kansas; and STEPHEN M.)	
HOWE, in his official capacity as District)	
Attorney for Johnson County,)	
)	
)	
Defendants-Appellants.)	

VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE*

An out-of-state attorney seeks admission to practice law in Kansas in this particular appeal.

1. My name is Genevieve Scott. I am regularly engaged in the practice of law and in good standing in New York according to the rules of the highest appellate court in that jurisdiction.
2. I am aware that, if this application is granted, I will be subject to the order of, and amendable to disciplinary action by, the Kansas appellate courts. In support of my application I state the following:
 - A. I, along with local counsel, represent Appellees Hodes & Nauser, MDs, PA, Dr. Herbert Hodes, MD, and Dr. Traci Nauser, MD, on behalf of themselves and their current and

future patients seeking termination of pregnancy medical services.

- B. Local counsel are Bob Eye, Kansas Bar #10689, Robert V. Eye Law Office, 123 SE 6th Avenue, Suite 200, Topeka, KS 66603, Phone (785) 234-4040, Fax (785) 234-4046, bob@kauffmaneye.com; Erin Thomson, Kansas Bar #22117, Thompson Law Firm, 106 E. 2nd Street, Wichita, KS 67202, Phone (316) 267-3933, Fax (316) 267-3901, ethompson@tslawfirm.com; and Teresa Woody, Kansas Bar #16949, The Woody Law Firm, 1621 Baltimore Ave, Kansas City, MO 64108, Phone (816) 421-4246, Fax (816) 471-4883, teresa@woodylawfirm.com.
- C. My residence address is 377 Rector Place, New York, NY 10280. My business address is the Center for Reproductive Rights, 199 Water Street, 22nd Floor, New York, NY 10038. My business phone number is (917) 637-3605, and my business fax number is (917) 637-3666. My email address is gscott@reprorights.org.
- D. I was admitted to the New York Bar on 4/6/2011, registration #4922811.
- E. I am a member in good standing of the above bar.
- F. I have not been the subject of prior public discipline, including but not limited to suspension or disbarment, in any jurisdiction.
- G. No disciplinary action or investigation is currently pending against me in any jurisdiction.
- H. I have not been admitted *pro hac vice* by any Kansas court in the past 12 months; however a motion and application for *pro hac* admission is currently pending in the District Court in this case, Civil Action #15-CV-490.

I swear or affirm that all of the above information is true and correct to the best of my knowledge. I understand that I remain under a continuing obligation to notify the Clerk of the Appellate Courts if a change occurs in any of the information provided.

By: Genevieve Scott

Genevieve Scott, NY Bar #4922811
Center for Reproductive Rights
199 Water Street, 22nd Floor
New York, NY 10038
(917) 637-3605
gscott@reprorights.org

ATTORNEY FOR PLAINTIFFS

SUBSCRIBED AND SWORN TO before me this 28 day of July, 2015.



NOTARY PUBLIC

My Commission Expires:

March 24, 2018

TISEME G. ZEGEYE
NOTARY PUBLIC-STATE OF NEW YORK
No. 02ZE629987D
Qualified in New York County
My Commission Expires March 24, 2018

CERTIFICATE OF SERVICE

I certify that the a true and correct copy of this **VERIFIED APPLICATION** was sent by United States Mail, postage prepaid, on July 30, 2015, to:

Shon D. Qualseth
Stephen R. McAllister
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Hodes & Nausser, MDs, PA
Herbert C. Hodes, MD
Traci Lynn Hodes Nausser, MD
4840 College Boulevard
Overland Park, KS 66211


GENEVIEVE SCOTT
ATTORNEY FOR PLAINTIFFS