

IN THE SUPREME COURT OF KANSAS

FAITH RIVERA, DIOSSELYN TOT-  
VELASQUEZ, KIMBERLY  
WEAVER, PARIS RAITE,  
DONNAVAN DILLON, and LOUD  
LIGHT,

Plaintiffs-Appellees,

TOM ALONZO, SHARON AL-UQDAH,  
AMY CARTER, CONNIE BROWN  
COLLINS, SHEYVETTE DINKENS,  
MELINDA LAVON, ANA MARCELA  
MALDONADO MORALES, LIZ  
MEITL, RICHARD NOBLES, ROSE  
SCHWAB, and ANNA WHITE,

Plaintiffs-Appellees,

SUSAN FRICK, LAUREN SULLIVAN,  
DARRELL LEA, and SUSAN SPRING  
SCHIFFELBEIN,

Plaintiffs-Appellees,

v.

SCOTT SCHWAB, in his official  
capacity as Kansas Secretary of State,  
and MICHAEL ABBOTT, in his  
official capacity as Election  
Commissioner of Wyandotte County,  
Kansas,

Defendants-Appellants,

JAMIE SHEW, in his official capacity as  
Douglas County Clerk.

Defendant.

Case No. 125092

MOTION FOR ADMISSION PRO HAC VICE

A Kansas attorney of record seeks the admission of an out-of-state attorney to practice law in this case.

1. *Background.* Sharon Brett, an attorney in this case, admitted to practice law in Kansas, and in good standing, asks this court to admit John A. Freedman to practice law in Kansas for this particular case.

2. *Authority.* Supreme Court Rule 1.10. 3.

3. *Reasons.* John A. Freedman is needed to assist in this case. He is already admitted to practice law in: The Commonwealth of Massachusetts (admitted: 12/17/1995, bar #629778); The State of New York (admitted: 1/23/1996, bar #2727709); The District of Columbia (admitted: 12/02/1996, bar #453075); United States Court of Appeals for the District of Columbia Circuit (admitted: 12/02/1998, bar #453075); United States District Court for the District of Columbia (admitted: 2/2/1998, bar #453075); United States Court of Appeals for the Fourth Circuit (admitted: 12/14/1998, bar #N/A); United States District Court for the Southern District of New York (admitted: 04/20/1999, bar #JF6574); Supreme Court of the United States (admitted: 06/01/1999, bar #N/A); United States District Court for the District of Massachusetts (admitted: 08/22/2001, bar #629778); United States Court of Appeals for the Sixth Circuit (admitted: 03/13/2006; bar #N/A); United States Court of Appeals for the Tenth Circuit (admitted: 04/15/2014, bar #N/A); United States District Court for the District of Maryland (admitted: 01/26/2018; bar #20276); United States Court of Appeals for the Second Circuit

(admitted: 10/01/2018, bar #N/A); United States Court of Appeals for the Eighth Circuit (admitted: 11/16/2021, bar #21-0484). He is in good standing under the rules of the highest appellate courts in all of the jurisdictions in which he regularly appears.

4. Sharon Brett will remain actively engaged in this case, will sign all pleadings, documents, motions and briefs, and will be present during oral argument if scheduled.

5. The verified application of John A. Freedman and the \$100 non-refundable fee are being submitted electronically.

Respectfully submitted,

/s/ Sharon Brett

Sharon Brett KS #28696  
ACLU Foundation of Kansas  
6701 W. 64<sup>th</sup> Street, Suite 210  
Overland Park, KS 66202  
Tel: (913) 490-4100  
Fax: (913) 490-4119

sbrett@aclukansas.org

*Counsel for Respondents Tom Alonzo,  
Sharon Al-Ugdah, Amy Carter, Connie  
Brown Collins, Sheyvette Dinkens,  
Melinda Layon, Ana Marcela  
Maldonado Morales, Liz Meitl, Richard  
Nobles, Rose Schwab, and Anna White.*

## CERTIFICATE OF SERVICE

I certify that on April 29, 2022, a true and correct copy of this Motion for Admission *Pro Hac Vice* was electronically filed along with the accompanying Verified Application for Admission using the Court's electronic filing system which will serve all parties. I have informed my clients in this case that I am utilizing out-of-state attorneys for this appeal, and provided a copy of this motion to my clients via first class mail to their residences as shown below:

Tom Alonzo  
507 N. Thompson  
Kansas City, KS 66101

Connie Brown Collins  
2223 N. 64<sup>th</sup> St.  
Kansas City, KS 66104

Sheyvette Dinkens  
2303 S. Early St.  
Kansas City, KS 66103

Ana Marcela Maldonado Morales  
2014 Elizabeth Ave.  
Kansas City, KS 66102

Richard Nobles  
13911 Russell St, Apt 118  
Overland Park, KS 66223

Anna White  
333 Cambridge St.  
Kansas City KS 66103

Sharon Al-Uqdah  
7011 Cleveland Ave.  
Kansas City, KS 66109

Amy Carter  
12724 W 138th St.  
Overland Park, KS 66221

Melinda Lavon  
539 Ohio St.  
Lawrence, KS 66044

Liz Meitl  
6009 W. 86th St.  
Overland Park, KS 66207

Rose Schwab  
2014 Elizabeth Ave.  
Kansas City, KS 66102

On the same day a copy was also served by email on counsel for the Kansas Secretary of State, Brant M. Laue, [brant.laue@ag.ks.gov](mailto:brant.laue@ag.ks.gov).

/s/ Sharon Brett  
\_\_\_\_\_  
Sharon Brett, KS #28696

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official capacity as Election  
Commissioner of Wyandotte County,  
Kansas,

Defendants-Appellants,

JAMIE SHEW, in his official capacity as  
Douglas County Clerk.

Defendant.

Case No. 125092

VERIFIED APPLICATION FOR ADMISSION PRO HAC VICE

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

1. *Background.* My name is John A. Freedman. I am regularly engaged in the practice of law and in good standing in the courts identified below according to the rules of the highest appellate court in that jurisdiction.

2. *Authority.* Supreme Court Rule 1.10(e).

I am aware that, if this application is granted, I will be subject to the order of, and amenable to disciplinary action by, the Kansas appellate courts. In support of my application I state the following:

3. I represent Respondents from the Wyandotte County District Court case 2022-CV-90; Tom Alonzo, Sharon Al-Uqdah, Amy Carter, Connie Brown Collins, Sheyvette Dinkens, Melinda Lavon, Ana Marcela Maldonado Morales, Liz Meitl, Richard Nobles, Rose Schwab, and Anna White.

4. The Kansas attorney of record is Sharon Brett, Supreme Court registration number 28696, and conducts business from:

ACLU Foundation of Kansas  
6701 W. 64<sup>th</sup> Street, Suite 210  
Overland Park, KS 66202  
Tel: (913) 490-4100  
Fax: (913) 490-4119  
[sbrett@aclukansas.org](mailto:sbrett@aclukansas.org)

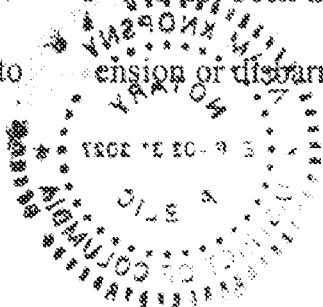
5. My residential address is 4408 Ridge Street, Chevy Chase, MD 20815. My business address, phone number, fax number and e-mail address are:

Arnold & Porter Kaye Scholer LLP  
601 Massachusetts Avenue, NW  
Washington, DC 20001  
Tel: (202) 942-5000  
Fax: (202) 942-5999  
[john.freedman@arnoldporter.com](mailto:john.freedman@arnoldporter.com)

6. I am admitted to the following bar(s): The Commonwealth of Massachusetts (admitted: 12/17/1995, bar #629778); The State of New York (admitted: 1/23/1996, bar #2727709); The District of Columbia (admitted: 12/02/1996, bar #453075); United States Court of Appeals for the District of Columbia Circuit (admitted: 12/02/1998, bar #453075); United States District Court for the District of Columbia (admitted: 2/2/1998, bar #453075); United States Court of Appeals for the Fourth Circuit (admitted: 12/14/1998, bar #N/A); United States District Court for the Southern District of New York (admitted: 04/20/1999, bar #JF6574); Supreme Court of the United States (admitted: 06/01/1999, bar #N/A); United States District Court for the District of Massachusetts (admitted: 08/22/2001, bar #629778); United States Court of Appeals for the Sixth Circuit (admitted: 03/13/2006; bar #N/A); United States Court of Appeals for the Tenth Circuit (admitted: 04/15/2014, bar #N/A); United States District Court for the District of Maryland (admitted: 01/26/2018; bar #20276); United States Court of Appeals for the Second Circuit (admitted: 10/01/2018, bar #N/A); United States Court of Appeals for the Eighth Circuit (admitted: 11/16/2021, bar #21-0484).

7. I am a member in good standing of each of the above bars.

8. I have not been the subject of prior public discipline, including but not limited to suspension or disbarment, in any jurisdiction.



9. No disciplinary action or investigation is currently pending against me in any jurisdiction.

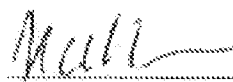
10. Within the preceding 12 months, I have been admitted *pro hac vice* in Kansas in the following case: *Alonzo, et al. v. Schwab, et al.*, Case No. 2022-CV-90, Wyandotte County District Court.

11. 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.

12. The required non-refundable \$100 fee, payable to the clerk of the Supreme Court is included with this application.

I swear or affirm that all of this information is true and correct to the best of my knowledge.

I verify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. Executed on April 22, 2022.



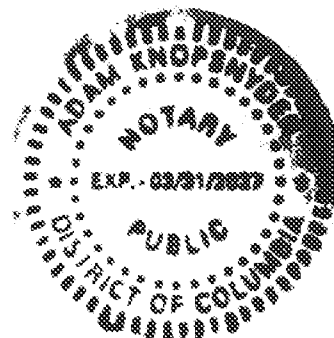
John A. Freedman  
District of Columbia Bar #453075  
ARNOLD & PORTER KAYE SCHOLER LLP  
601 Massachusetts Avenue, NW  
Washington, DC 20001  
Tel: (202) 942-5000  
Fax: (202) 942-5999  
[john.freedman@arnoldporter.com](mailto:john.freedman@arnoldporter.com)

SUBSCRIBED AND SWORN TO before me on this 27 day of April, 2022.

  
NOTARY PUBLIC

SEAL:

My commission expires 3/31/27.





## CERTIFICATE OF SERVICE

I certify that on April 29, 2022, a true and correct copy of this Verified Application for Admission *Pro Hac Vice* was electronically filed along with the accompanying Motion for Admission *Pro Hac Vice* using the Court's electronic filing system which will serve all parties. I have informed my clients in this case that I am utilizing out-of-state attorneys for this appeal, and provided a copy of this motion to my clients via first class mail to their residences as shown below:

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Liz Meitl  
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On the same day a copy was also served by email on counsel for the Kansas Secretary of State, Brant M. Laue, [brant.laue@ag.ks.gov](mailto:brant.laue@ag.ks.gov).

/s/ Sharon Brett  
\_\_\_\_\_  
Sharon Brett, KS #28696