

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 Mark P. Gaber to practice law in Kansas for this particular case.

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

3. *Reasons.* Mark P. Gaber is needed to assist in this case. He is already admitted to practice law in: U.S. District Court for the Western District of Wisconsin (admitted 09/08/2021); U.S. Court of Appeals for the Eighth Circuit (admitted 06/06/2020, Bar No. 2000165); U.S. District Court for the District of North Dakota (admitted 05/2020); U.S. Court of Appeals for the Sixth Circuit (admitted 12/05/2019); U.S. Court of Appeals for the Eleventh Circuit (admitted 11/26/2019); U.S. District Court for Western District of Michigan (admitted 08/30/2019); U.S. District Court for D.C. (admitted 02/01/2016, Bar No. 988077); U.S. Supreme Court (admitted 11/02/2016); U.S. Court of Appeals for the Tenth Circuit (admitted 11/12/2014); U.S. Court of Appeals for the Fourth Circuit (admitted 05/01/2014); U.S. Court of Appeals for the Fifth Circuit (admitted 10/30/2013); U.S. Court of Appeals for the D.C. Circuit (admitted 04/30/2012, Bar No. 54107); District of Columbia Bar (admitted 10/2011); California State Bar (inactive, admitted 12/2010, bar #N/A). 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 Mark P. Gaber 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. 64th Street, Suite 210
Overland Park, KS 66202
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*Counsel for Respondents 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.*

CERTIFICATE OF SERVICE

I certify that on April 28, 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 email. 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.

/s/ Sharon Brett

Sharon Brett, KS #28696

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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 Mark P. Gaber. 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.

3. In support of my application I state the following 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. 64th Street, Suite 210
Overland Park, KS 66202
Tel: (913) 490-4100
Fax: (913) 490-4119
sbrett@aclukansas.org

5. My residential address is 439 Elm St. NW, Washington, D.C. 20001. My business address, phone number, fax number and e-mail address are:

Campaign Legal Center
1101 14th St. NW, Ste. 400
Washington, D.C., 20005

Tel: (202) 736-2200
Fax: (202) 736-2222
mgaber@campaignlegalcenter.org

6. I am admitted to the following bar(s): U.S. District Court for the Western District of Wisconsin (admitted 09/08/2021); U.S. Court of Appeals for the Eighth Circuit (admitted 06/06/2020, Bar No. 2000165); U.S. District Court for the District of North Dakota (admitted 05/2020); U.S. Court of Appeals for the Sixth Circuit (admitted 12/05/2019); U.S. Court of Appeals for the Eleventh Circuit (admitted 11/26/2019); U.S. District Court for Western District of Michigan (admitted 08/30/2019); U.S. District Court for D.C. (admitted 02/01/2016, Bar No. 988077); U.S. Supreme Court (admitted 11/02/2016); U.S. Court of Appeals for the Tenth Circuit (admitted 11/12/2014); U.S. Court of Appeals for the Fourth Circuit (admitted 05/01/2014); U.S. Court of Appeals for the Fifth Circuit (admitted 10/30/2013); U.S. Court of Appeals for the D.C. Circuit (admitted 04/30/2012, Bar No. 54107); District of Columbia Bar (admitted 10/2011); California State Bar (inactive, admitted 12/2010).

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.

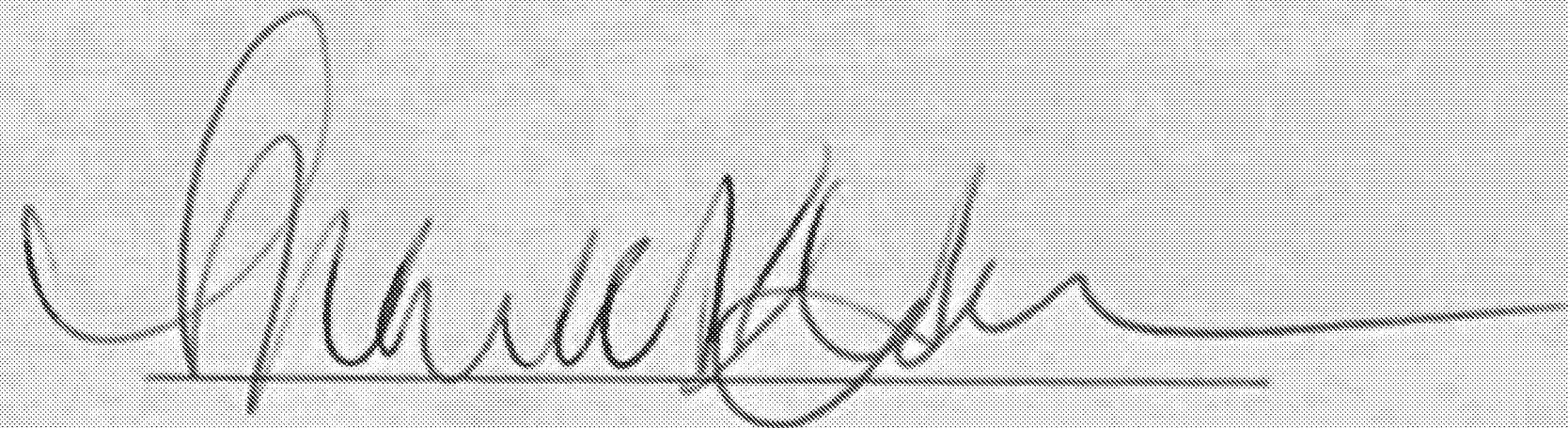
10. Within the preceding 12 months, I have been admitted *pro hac vice* in Kansas in the following case: *Alonzo, et al. v. Schwab, et al.*, Case No. 2022-CV-90, Wyandotte County District Court.

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 ²⁸ 27, 2022.



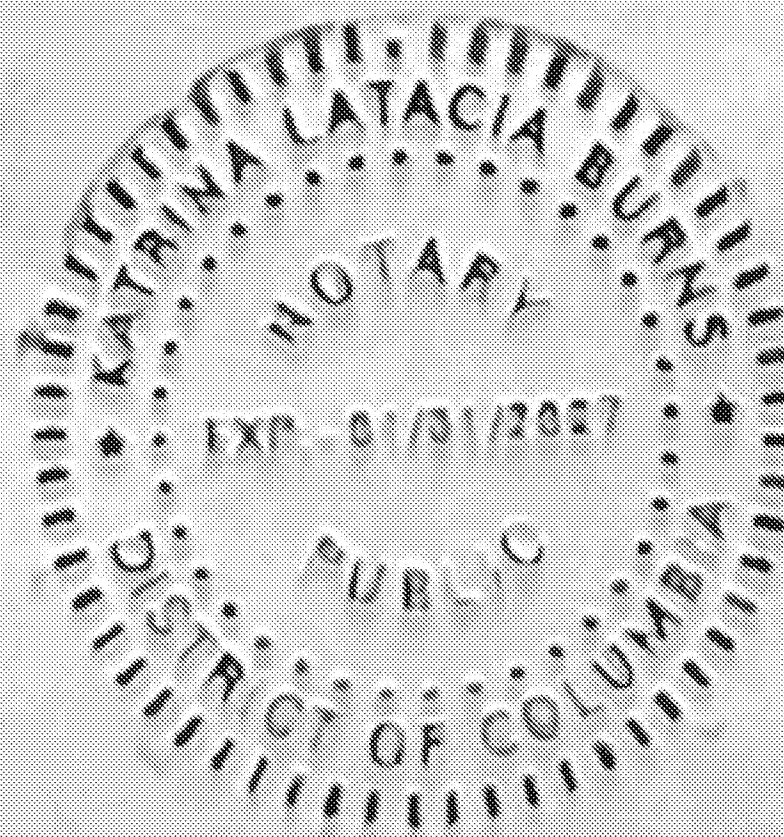
Mark P. Gaber
District of Columbia Bar #988077
Campaign Legal Center
1101 14th St. NW, Ste. 400
Washington, D.C., 20005
Tel: (202) 736-2200
Fax: (202) 736-2222
mgaber@campaignlegalcenter.org

SUBSCRIBED AND SWORN TO before me on this 28th day of April, 2022.


NOTARY PUBLIC

SEAL:

My commission expires 01.01.2027



CERTIFICATE OF SERVICE

I certify that on April 28, 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 verified application to my clients via email. 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.

/s/ Sharon Brett

Sharon Brett, KS #28696