

**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 Orion de Nevers to practice law in Kansas for this particular case.

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

3. *Reasons.* Orion de Nevers is needed to assist in this case. He is already admitted to practice law in: Bar of California (admitted 11/25/2021, bar #340127). 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 Orion de Nevers 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](mailto:sbrett@aclukansas.org)

*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 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 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](mailto:brant.laue@ag.ks.gov).

/s/ Sharon Brett  
Sharon Brett, KS #28696

**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

**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 Orion de Nevers. 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 1725 Riggs Pl. NW, Washington DC, 20009. My business address, phone number, fax number and e-mail address are:

Campaign Legal Center  
1101 14<sup>th</sup> St. NW, Ste. 400  
Washington, D.C. 20005  
Tel: (202) 736-2200  
Fax: (202) 736-2222  
[odenevers@campaignlegalcenter.org](mailto:odenevers@campaignlegalcenter.org)

6. I am admitted to the following bar(s): Bar of California (admitted 11/25/2021, bar #340127).
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, 2022.



Orion de Nevers\*  
California Bar #340127  
1101 14<sup>th</sup> St. NW, Ste. 400  
Washington, D.C. 20005  
Tel: (202) 736-2200  
Fax: (202) 736-2222  
[odenevers@campaignlegalcenter.org](mailto:odenevers@campaignlegalcenter.org)

*\* Licensed to practice in California only; District of Columbia Bar application pending. Supervised by Mark P. Gaber, a member of the D.C. Bar*

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

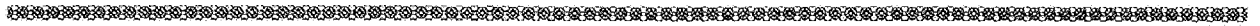
Toan Tran  
NOTARY PUBLIC

SEAL:

My commission expires Jan. 3 2026

**-See attached notarial certificate-**





A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of San Diego

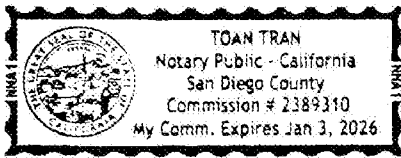
Subscribed and sworn to (or affirmed) before me on this 28 day of April, 2022, by  
*Date Month Year*

(1) Orion de Nevers

(and (2) \_\_\_\_\_),  
*Name(s) of Signer(s)*

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature [Handwritten Signature]  
*Signature of Notary Public*



Place Notary Seal and/or Stamp Above

OPTIONAL

Completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: Motion for Admission Pro Hac Vice

Document Date: April 28, 2022 Number of Pages: 9

Signer(s) Other Than Named Above: Sharon Brett



## 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 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](mailto:brant.laue@ag.ks.gov).

/s/ Sharon Brett

Sharon Brett, KS #28696