



KS S Ct Pro Hac Vice--Elisabeth S. Theodore_.pdf

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E-Signature Summary

E-Signature 1: Elisabeth S. Theodore (EST)

April 28, 2022 09:33:59 -7:00 [3D345F464F60] [71.255.239.196]
 Elisabeth.Theodore@arnoldporter.com (Principal) (Personally Known)

E-Signature Notary: Massiel Rivera (MR)

April 28, 2022 09:33:59 -7:00 [F455F467D915] [192.203.255.20]
 massielcasandra@icloud.com
 I, Massiel Rivera, did witness the participants named above electronically sign this document.



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

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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 Elisabeth S. Theodore to practice law in Kansas for this particular case.

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

3. *Reasons.* Elisabeth S. Theodore is needed to assist in this case. She is already admitted to practice law in: District of Columbia (admitted: 6/9/2014, bar #1021029); State of Maryland (admitted: 12/15/2011, bar #1112150207); Supreme Court of the United States (admitted: 10/3/2016, bar # N/A); U.S. Court of Appeals for the First Circuit (admitted: 11/13/2019, bar #1191256); U.S. Court of Appeals for the Second Circuit (admitted: 10/20/2017, bar # N/A); U.S. Court of Appeals for the Third Circuit (admitted: 3/15/2018, bar # N/A); U.S. Court of Appeals for the Fourth Circuit (admitted: 1/30/2019, bar # N/A); U.S. Court of Appeals for the Fifth Circuit (admitted: 10/29/2019, bar # N/A); U.S. Court of Appeals for the Sixth Circuit (admitted: 1/14/2014, bar #2901); U.S. Court of Appeals for the Seventh Circuit (admitted: 9/29/2017, bar # N/A); U.S. Court of Appeals for the Eighth Circuit (admitted: 1/15/2020, bar #20-0028); U.S. Court of Appeals for the Ninth Circuit (admitted: 4/23/2015, bar # N/A); U.S. Court of Appeals for the Tenth Circuit (admitted: 1/15/2020, bar # N/A); U.S. Court of Appeals for the Eleventh Circuit (admitted: 2/12/2020, bar # N/A); U.S. Court of Appeals for the D.C.

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Circuit (admitted: 1/31/2014, bar #55234); U.S. Court of Appeals for the Federal Circuit (admitted: 2/13/2020, bar # N/A); U.S. District Court for the District of Columbia (admitted: 3/6/2017, bar #1021029). She is in good standing under the rules of the highest appellate courts in all of the jurisdictions in which she 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 Elisabeth S. Theodore 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
Tel: (913) 490-4100
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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.*

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CERTIFICATE OF SERVICE

I certify that on April 27, 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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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*

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

1. *Background.* My name is Elisabeth S. Theodore. 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. 64th Street, Suite 210
Overland Park, KS 66202
Tel: (913) 490-4100
Fax: (913) 490-4119
sbrett@aclukansas.org

5. My residential address is 880 P Street, NW, Apt. 818, Washington, DC 20001. My business address, phone number, fax number and e-mail address are:

Arnold & Porter Kaye Scholer LLP

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601 Massachusetts Avenue, NW
Washington, DC 20001
Tel: (202) 942-5000
Fax: (202) 942-5999
elisabeth.theodore@arnoldporter.com

6. I am admitted to the following bar(s): District of Columbia (admitted: 6/9/2014, bar #1021029); State of Maryland (admitted: 12/15/2011, bar #1112150207); Supreme Court of the United States (admitted: 10/3/2016, bar # N/A); U.S. Court of Appeals for the First Circuit (admitted: 11/13/2019, bar #1191256); U.S. Court of Appeals for the Second Circuit (admitted: 10/20/2017, bar # N/A); U.S. Court of Appeals for the Third Circuit (admitted: 3/15/2018, bar # N/A); U.S. Court of Appeals for the Fourth Circuit (admitted: 1/30/2019, bar # N/A); U.S. Court of Appeals for the Fifth Circuit (admitted: 10/29/2019, bar # N/A); U.S. Court of Appeals for the Sixth Circuit (admitted: 1/14/2014, bar #2901); U.S. Court of Appeals for the Seventh Circuit (admitted: 9/29/2017, bar # N/A); U.S. Court of Appeals for the Eighth Circuit (admitted: 1/15/2020, bar #20-0028); U.S. Court of Appeals for the Ninth Circuit (admitted: 4/23/2015, bar # N/A); U.S. Court of Appeals for the Tenth Circuit (admitted: 1/15/2020, bar # N/A); U.S. Court of Appeals for the Eleventh Circuit (admitted: 2/12/2020, bar # N/A); U.S. Court of Appeals for the D.C. Circuit (admitted: 1/31/2014, bar #55234); U.S. Court of Appeals for the Federal Circuit (admitted: 2/13/2020, bar # N/A); U.S. District Court for the District of Columbia (admitted: 3/6/2017, bar #1021029).

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.

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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.

Elisabeth S. Theodore
Signed on 2022/04/28 09:23:59 -7:00

Elisabeth S. Theodore
District of Columbia Bar #1021029
Arnold & Porter Kaye Scholer LLP
601 Massachusetts Avenue, NW
Washington, DC 20001
Tel: (202) 942-5000
Fax: (202) 942-5999
elisabeth.theodore@arnoldporter.com

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



NOTARY PUBLIC

My commission expires February 11, 2024.

SEAL 
MASSIEL RIVERA
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 20204005954
MY COMMISSION EXPIRES February 11, 2024

Notarial act performed by audio-visual communication

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CERTIFICATE OF SERVICE

I certify that on April 27, 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

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