

FILED**MAR 05 2021****CLERK OF SUPREME COURT
OF WISCONSIN****Appeal No. 2018AP2205**

**STATE OF WISCONSIN
SUPREME COURT**

IN THE INTEREST OF C. G., a person under the age of 18:**STATE OF WISCONSIN,****Petitioner-Respondent,****v.****C. G.,****Respondent-Appellant-Petitioner.**

**MOTION FOR ADMISSION *PRO HAC VICE* OF
MARSHA L. LEVICK**

Pursuant to SCR 10.03(4)(b), Matthew S. Pinix files this motion for admission *pro hac vice* of nonresident counsel, Marsha L. Levick, and states as follows:

1. Matthew S. Pinix is an active member, in good standing, of the State Bar of Wisconsin and agrees to associate with Marsha L. Levick in the above captioned case.
2. Marsha L. Levick is a member in good standing of the Bar of the highest court of the Commonwealth of Pennsylvania, where Applicant regularly practices law.

3. Attorney Levick is admitted in the following courts:

Commonwealth of Pennsylvania (PA Bar No. 22535, admitted: 2/23/1976);

United States District Court – Eastern District of Pennsylvania (admitted: 4/22/1976);

United States District Court – Middle District of Pennsylvania (admitted: 4/22/1976);

United States District Court – Western District of Wisconsin (admitted: 1/20/2017);

United States Court of Appeals for the 2nd Circuit (admitted: 1/15/2014);

United States Court of Appeals for the 3rd Circuit (admitted: 4/9/1999);

United States Court of Appeals for the 5th Circuit (admitted: 5/18/2016);

United States Court of Appeals for the 6th Circuit (admitted: 6/11/1993);

United States Court of Appeals for the 7th Circuit (admitted: 4/2/1993);

United States Court of Appeals for the 9th Circuit (admitted: 10/15/2013);

United States Court of Appeals for the DC Circuit (admitted: 4/30/2008);

United States Supreme Court (admitted: 2/24/1986).

4. Attorney Levick has complied with SCR Rule 10.03(4) governing *pro hac vice* admissions and submitted her Application for *Pro Hac Vice* Admission to the State Bar of Wisconsin on February 25, 2021 along with a cover letter certifying that she qualifies for waiver of the *pro hac vice* admission fee. Attorney Levick's original Application for Pro Hac Vice

Admission, cover letter, and proof of service are attached hereto as Exhibit A.


5. Attorney Levick is the Chief Legal Officer of Juvenile Law Center, a non-profit public interest law firm with significant expertise in the issues before the Court in this case. Juvenile Law Center is located at 1800 JFK Blvd, Suite #1900B, Philadelphia, PA 19103.
6. Juvenile Law Center advocates for rights, dignity, equity and opportunity for youth in the child welfare and justice systems through litigation, appellate advocacy and submission of amicus briefs, policy reform, public education, training, consulting, and strategic communications. Founded in 1975, Juvenile Law Center is the first non-profit public interest law firm for children in the country. Juvenile Law Center strives to ensure that laws, policies, and practices affecting youth advance racial and economic equity and are rooted in research, consistent with children's unique developmental characteristics, and reflective of international human rights values.

WHEREFORE, for the reasons set forth above and in the attached exhibit, counsel respectfully requests that this Court grant attorney Levick's Motion for Admission *Pro Hac Vice* in this matter and waive the admission fee required under SCR 10.03(4)(b)(2).

I, Matthew S. Pinix, Wisconsin counsel, have read the out-of-state attorney's Application for Admission *Pro Hac Vice*, have made a reasonable inquiry concerning

the averments made therein, believe the out-of-state attorney's representations are true, and agree to ensure that the procedures of SCR Rule 10.03(4) are followed.

Respectfully submitted, this 5th day of March, 2021.

A handwritten signature in black ink, appearing to read 'Matthew S. Pinix', written over a horizontal line.

MATTHEW S. PINIX

Wisconsin Bar No. 1064368

PINIX LAW, LLC

1200 East Capitol Drive, Suite 360

Milwaukee, WI 53211

Phone: 414.963.6164

matthew@pinixlaw.com

CERTIFICATION

I certify that a copy of this motion has been filed with the Court and served on all parties on this 5th day of March 2021 as follows:

Gregory A. Parker
311 N. Main St.
Shawano, WI 54166-2145

Scott E. Rosenow
P.O. Box 7857
Madison, WI 53707-7857

Attorneys for Petitioner-Respondent

Cary E. Bloodworth
P.O. Box 7862
Madison, WI 53707-7862

Attorney for Respondent-Appellant-Petitioner.

A handwritten signature in black ink, appearing to read 'Matthew S. Pinix', written over a horizontal line.

MATTHEW S. PINIX
Wisconsin Bar No. 1064368
PINIX LAW, LLC
1200 East Capitol Drive, Suite 360
Milwaukee, WI 53211
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Juvenile Law Center

Fighting for the rights
and well-being of youth

1800 JFK Boulevard, Ste. 1900B
Philadelphia, PA 19103
215-625-0551 / 800-875-8887
215-625-2808 fax
www.jlc.org

February 25, 2021

State Bar of Wisconsin
5302 Eastpark Blvd.
Madison, WI 53718-2101

Re: Application for *Pro Hac Vice* Admission of Marsha L. Levick
In the Interest of C.G., No. 2018AP2205 (Wisconsin Supreme Court)

Dear State Bar of Wisconsin,

Enclosed please find a copy the Application for *Pro Hac Vice* Admission of Marsha L. Levick. In lieu of the *pro hac vice* admission fee, the following certified statement is made in support of waiver.

I, Marsha L. Levick, certify that I am employed by Juvenile Law Center, a nonprofit public interest law firm for children. I further certify that I am seeking *pro hac vice* admission in the above captioned case for the purpose of filing a non-party *amicus curiae* brief in support of indigent Respondent-Appellant C.G., and will not charge a fee for my appearance.

Thank you for your time and attention to this matter.

Sincerely,



Marsha L. Levick
Chief Legal Officer

Encl.

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STATE OF WISCONSIN, CIRCUIT COURT, SUPREME COURT COUNTYCase Caption: In the interest of C.G., a
person under the age of 18: State of Wisconsin
v. C.G.**Application for
Pro Hac Vice Admission**Case No. 2018AP2205**I DECLARE UNDER PENALTY OF PERJURY:**

1. That I seek to appear pro hac vice in order to represent Amicus Curiae Juvenile Law Center in the above-captioned matter;
2. That I am admitted to practice law in the highest court(s) of the state(s) or country(ies) of Pennsylvania
3. That there are no disciplinary complaints filed against me for violation of the rules of those courts (if so, please explain): _____
4. That I am not suspended or disbarred from practice for disciplinary reasons or reason of medical incapacity in any jurisdiction (if yes, please explain): _____
5. That I am associated with Attorney Matthew S. Pirix State Bar No. 1064368, an active member of the State Bar of Wisconsin (name the member of the State Bar of Wisconsin and provide his/her Member Number);
6. That I do not practice or hold out to practice law in the State of Wisconsin;
7. That I acknowledge the jurisdiction of the courts of the State of Wisconsin over my professional conduct, and I agree to abide by the rules of the relevant division of the Circuit Court of the State of Wisconsin, the Wisconsin Court of Appeals, the Wisconsin Supreme Court, and the Rules of Professional Conduct for Attorneys, if I am admitted pro hac vice;
8. That I have complied fully with SCR Rule 10.03 (4);
9. That I am applying for admission pro hac vice for the following reasons: in order to file a non-party amicus curiae brief in support of indigent Respondent-Appellant C.G. in the Wisconsin Supreme Court, appeal no. 2018AP2205.

I have applied for admission pro hac vice in the courts of the State of Wisconsin 0 times previously in this calendar year.

I attach hereto evidence of my payment or prior payment of the pro hac vice fee.

Signature of Attorney <u>Marsha L. Levick</u>	Telephone Number <u>(215) 625-0551</u>
Name Printed <u>Marsha L. Levick</u>	Email Address (if any) <u>mlevick@jc.org</u>
Address of Principal Office <u>1800 JFK Blvd. Suite 1900B, Philadelphia, PA 19103</u>	