

SUPREME COURT OF WISCONSIN

Appeal No. 2021AP001450 - OA

FILED

SEP 20 2021

CLERK OF SUPREME COURT
OF WISCONSIN

BILLIE JOHNSON, et al.,

Petitioners,

v.

WISCONSIN ELECTIONS COMMISSION, et al.,

Respondents.

Original Action in the Wisconsin Supreme Court

**AFFIDAVIT OF MARK P. GABER IN SUPPORT OF
MOTION FOR ADMISSION *PRO HAC VICE***DISTRICT OF COLUMBIA)
 : SS
CITY OF WASHINGTON)

Mark P. Gaber, after being duly sworn, states:

1. I am an attorney with the Campaign Legal Center, 1101 14th St. NW, Ste. 400, Washington, DC 20005. I am serving as counsel for Black Leaders Organizing for Communities ("BLOC"), Voces de la Frontera ("Voces"), League of Women Voters of Wisconsin ("LWVWI"), Cindy Fallona, Lauren Stephenson, Rebecca Alwin, Helen Harris, Woodrow Wilson Cain, II, Nina Cain, Tracie Y. Horton, Pastor Sean Tatum, Melody McCurtis, Barbara Toles, and Edward Wade, Jr. in this action, along with Stafford Rosenbaum LLP and Law Forward, Inc.

2. I admitted to practice law in the highest court of the District of Columbia (active) and California (inactive). I have been a member in good standing of the District of Columbia Bar since 2011, and the California Bar since 2010. I have never been the subject of a disciplinary proceeding.

3. I am not a Wisconsin resident, nor am I regularly engaged in the practice of law or other business in Wisconsin.

4. I have not been denied admission to any state or federal court; on one occasion a motion for admission *pro hac vice* that I filed in a Texas state court case was missing the necessary notarization and was denied without prejudice on that basis, but was subsequently granted when the error was corrected.

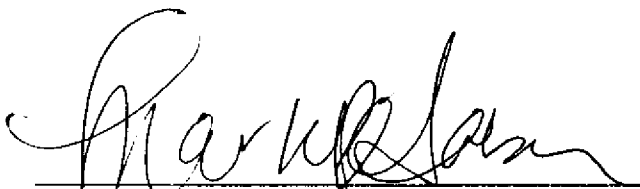
5. The law firm of Stafford Rosenbaum LLP has been retained by BLOC, Voces, LWVWI, Cindy Fallona, Lauren Stephenson, Rebecca Alwin, Helen Harris, Woodrow Wilson Cain, II, Nina Cain, Tracie Y. Horton, Pastor Sean Tatum, Melody McCurtis, Barbara Toles, and Edward Wade, Jr. in this matter, and is serving as local counsel in this matter. Stafford Rosenbaum LLP is located at 222 West Washington Avenue, Suite 900, Madison, Wisconsin, 53703 and the phone number is (608) 256-0226.

6. I am familiar with the facts of this case and will, if permitted, participate in this action in accordance with the rules of professional conduct for attorneys, the rules of decorum of the Court, and the local rules of the Court.

7. I have a preexisting eCourts account from a 2018 Wisconsin case in which I appeared *pro hac vice*, and on September 16, 2021, I submitted an Application for admission *pro hac vice* in this matter to the State Bar of Wisconsin, and paid the online

fee. True and correct copies of my Application for admission *pro hac vice* and proof of payment of the online fee are attached to this Affidavit as Exhibit 1.

Further, Affiant sayeth not.


Mark P. Gaber

Subscribed and sworn to before me this
16 day of September, 2021.

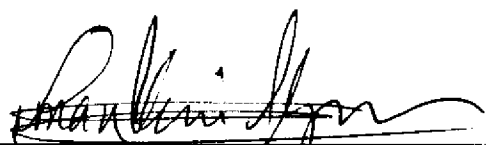

Notary Public, District of Columbia
My commission expires: 08/14/2024

EXHIBIT 1

STATE OF WISCONSIN, CIRCUIT COURT, Supreme Court of Wisconsin COUNTY

Case Caption: Billie Johnson, et al

v.

Wisconsin Election Commission, et al.

**Application for
Pro Hac Vice Admission**

Case No. 2021AP001450OA

I DECLARE UNDER PENALTY OF PERJURY:

1. That I seek to appear pro hac vice in order to represent
Amici Black Leaders Organizing Communities, et al.
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;
District of Columbia (active) and California (inactive)
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 Atty. Douglas M. Poland, State Bar No. 1055189
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:
I have been retained to appear on behalf of Amici in this matter.

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

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

Signature of Attorney Electronically signed by Mark P. Gaber 9/16/2021 2:54:	Telephone Number 202-736-2202
Name Printed Mr. Mark Gaber	Email Address (if any) mgaber@campaignlegal.org
Address of Principal Office 1101 14th St. NW, Washington, DC, 20001, United States	



**STATE BAR
OF WISCONSIN**

Receipt:

Name on the card: Mr. Mark Gaber

Payment Total: \$250.00

Payment Date: 9/16/2021 2:54:35 PM

Payment Method: Card ending with: *6010

Transaction Number: AL0E7A1EEA05