

IN THE SUPREME COURT OF OHIO

THE STATE OF OHIO ex rel.)
RHONDA L. COLVIN, et al.,)
)
Relators,)
)
v.)
)
JENNIFER BRUNNER,)
SECRETARY OF STATE OF OHIO,)
)
Respondent.)

CASE No. 08-1813
Original Action in Mandamus
Expedited Election Matter
Under Supreme Court Rule X § 9

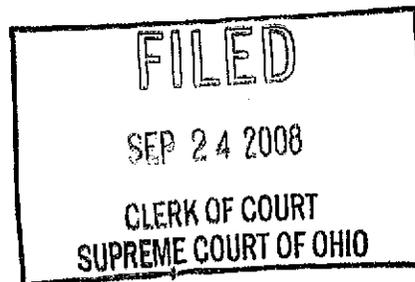
MOTION FOR ADMISSION PRO HAC VICE

Meredith Bell-Platts (OH 72917)
Counsel of Record
Neil Bradley*
230 Peachtree Street, NW
Suite 1440
Atlanta, Georgia 30303
(404) 523-2721 (phone)
(404) 653-0331 (fax)
mbell@aclu.org
nbradley@aclu.org
*pro hac vice application pending

Carrie L. Davis (OH 77041)
Jeffrey M. Gamso (OH 43869)
4506 Chester Avenue
Cleveland, Ohio 44103
(216) 472-2220 (phone)
(216) 472-2210 (fax)
cdavis@acluohio.org

Daniel P. Tokaji*
55 W. 12th Avenue
Columbus, Ohio 43210
(614) 292-6566 (phone)
(614) 688-8422 (fax)
dtokaji@gmail.com
*pro hac vice application pending

Paul Moke (0014099)
1252 Pyle Center
Wilmington College
Wilmington, Ohio 45177
937-382-6661 ext. 415 (phone)
937-382-7077 (fax)
paul_moke@wilmington.edu



Teresa James (0031671)
23556 Marion Road
North Olmsted, Ohio 44070
(440) 503-5422
tjames@projectvote.org

Richard Saphire (0017813)
300 College Park
Dayton, Ohio 45469-2772
937-229-2820 (phone)
937-229-2469 (fax)
saphire@udayton.edu

Brenda Wright*
358 Chestnut Hill Avenue
Suite 303
Brighton, Massachusetts 02135
(617) 232-5885 ext. 13 (phone)
(617) 232-7251 (fax)
bwright@demos.org
*pro hac vice application pending

Jon Greenbaum*
Bob Kengle*
1401 New York Avenue, NW
Suite 400
Washington, DC 20005
(202) 662-8600 (phone)
(202) 783-0857 (fax)
jgreenbaum@lawyerscomm.org
*pro hac vice application pending

Jennifer R. Scullion*
Matthew Morris*
1585 Broadway
New York, New York 10036
(212) 969-3600 (phone)
(212) 969-2900 (fax)
jscullion@proskauer.com
mmorris@proskauer.com
jsnyder@proskauer.com
*pro hac vice application pending

Attorneys for Amici Curiae on behalf of Respondent

Donald C. Brey
Elizabeth J. Watters
Deborah A. Scott
Chester, Willcox & Saxbe, LLP
65 East State Street, Suite 1000
Columbus, Ohio 43215
(612) 221-4000 (phone)
(614) 221-4012 (facsimile)
dbrey@cwslaw.com
ewatters@cwslaw.com
dscott@cwslaw.com

Attorneys for Relators

Nancy H. Rogers
Damian W. Sikora
Richard Coglianese
Office of the Attorney General
30 East Broad Street, 16th Floor
Columbus, Ohio 43215
(614) 466-4320 (phone)
(614) 263-7078 (facsimile)
drogers@ag.state.oh.us
dsikora@ag.state.oh.us
rcoglianese@ag.state.oh.us

Attorneys for Respondent

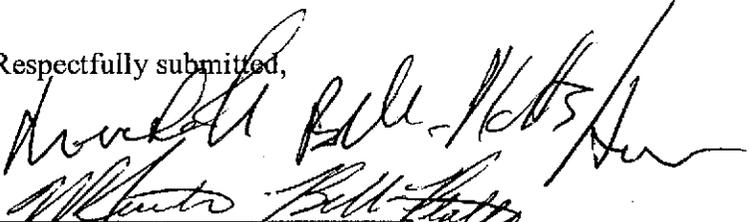
MOTION FOR ADMISSION PRO HAC VICE

Pursuant to Supreme Court Rule I § 2, Meredith Bell-Platts, a member in good standing of the Bar of the State of Ohio (bar identification number 72917), respectfully moves this Court to admit Jon Greenbaum to appear pro hac vice in this action. Jon Greenbaum is admitted to practice before the State Bar of California and has been a member in good standing since December 1993. His bar registration number is 166733. In addition, he is a member in good standing in the District of Columbia. Undersigned counsel can attest that he is of sound character and fitness. He has never been the subject of a disciplinary investigation or complaint.

His contact information is as follows:

Jon Greenbaum
Lawyers; Committee for Civil Rights Under Law
1401 New York Avenue, NW
Suite 400
Washington, DC 20005
(202) 662-8600 (phone)
(202) 783-0857 (fax)
jgreenbaum@lawyerscommittee.org

Respectfully submitted,

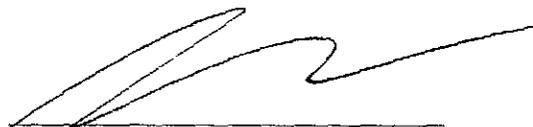

Meredith Bell-Platts (OH 72917)
ACLU/VOTING RIGHTS PROJECT
230 Peachtree Street, NW
Suite 1440
Atlanta, Georgia 30303
(404) 523-2721 (phone)
(404) 653-0331 (fax)
mbell@aclu.org

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion for Admission Pro Hac Vice was served via Federal Express overnight delivery on this 24th day of September, 2008, upon the following:

Donald Carl Brey
Deborah Scott
Elizabeth Watters
Chester, Willcox & Saxbe
65 East State Street
Suite 1000
Columbus, OH 43215

Richard Coglianese
Damian Sikora
Nancy Rogers
Ohio Attorney General's Office
30 East Broad Street
16th Floor
Columbus, OH 43215-6001



Jeffrey M. Gamso (OH 43869)
American Civil Liberties Union of Ohio
Foundation, Inc.
4506 Chester Avenue
Cleveland, Ohio 44103
(216) 472-2220 (phone)
(216) 472-2210 (fax)
jmgamso@acluohio.org