

STATE OF NORTH CAROLINA

COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE

SUPERIOR COURT DIVISION

Docket No. 19 CVS 012667

REBECCA HARPER; AMY CLARE
OSEROFF; DONALD RUMPH; JOHN
BALLA; RICHARD R. CREWS; LILY
NICOLE QUICK; GETTYS COHEN JR.;
SHAWN RUSH; JACKSON THOMAS
DUNN, JR.; MARK S. PETERS; JOSEPH
THOMAS GATES; KATHLEEN BARNES;
VIRGINIA WALTERS BRIEN; DAVID
DWIGHT BROWN,

Plaintiffs,

v.

REPRESENTATIVE DAVID R. LEWIS, IN
HIS OFFICIAL CAPACITY AS SENIOR
CHAIR OF THE HOUSE STANDING
COMMITTEE ON REDISTRICTING;
RALPH HISE, IN HIS OFFICIAL
CAPACITY AS CO-CHAIR OF THE
SENATE STANDING COMMITTEE ON
REDISTRICTING; WARREN DANIEL, IN
HIS OFFICIAL CAPACITY AS CO-CHAIR
OF THE SENATE STANDING
COMMITTEE ON REDISTRICTING; PAUL
NEWTON, IN HIS OFFICIAL CAPACITY
AS CO-CHAIR OF THE SENATE
STANDING COMMITTEE ON
REDISTRICTING; SPEAKER OF THE
NORTH CAROLINA HOUSE OF
REPRESENTATIVES TIMOTHY K.
MOORE; PRESIDENT PRO TEMPORE OF
THE NORTH CAROLINA SENATE PHILIP
E. BERGER; THE NORTH CAROLINA
STATE BOARD OF ELECTIONS; DAMON
CIRCOSTA, IN HIS OFFICIAL CAPACITY
AS CHAIRMAN OF THE NORTH
CAROLINA STATE BOARD OF

**MOTION FOR ADMISSION OF
COUNSEL
PRO HAC VICE**

FILED
2019 OCT -1 P 2:17
WAKE CO. C.S.C.
BY

Pursuant to N.C. Gen. Stat. § 84-4.1, Movants Burton Craige, Narendra K. Ghosh and Paul E. Smith hereby move for the admission of R. Stanton Jones, Elisabeth Theodore, Daniel Jacobson, William Perdue, Sara Murphy D'Amico, and Graham White, of the law firm Arnold & Porter Kaye Scholer LLP (collectively "Applicants"), to appear *pro hac vice* on behalf of Plaintiffs in the above referenced matter. In support of this motion, Burton Craige, Narendra K. Ghosh and Paul E. Smith and their law firm, Patterson Harkavy LLP, respectfully show the Court:

1. The Statements of Applicants, attached as **Exhibits A through F** respectively, set forth their qualifications to appear in this cause pursuant to N.C. Gen. Stat. § 84-4.1.

2. Mr. Jones, Ms. Theodore, Mr. Jacobson, Mr. Perdue, Ms. D'Amico, and Mr. White and the law firm of Arnold & Porter Kaye Scholer LLP, are counsel of choice for the Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Jackson Thomas Dunn, Jr., Mark S. Peters, Joseph Thomas Gates, Kathleen Barnes, Virginia Walters Brien and David Dwight Brown. A statement attesting to the retention of these Applicants and the law firm of Arnold & Porter Kaye Scholer LLP is attached to this Motion as **Exhibit G**.

3. Pursuant to N.C. Gen. Stat. § 84-4.1(5), as local counsel in this matter and a resident of North Carolina, Mr. Craige, Ms. Ghosh and Mr. Smith agree to be responsible for filing the required registration statement for Applicants with the North Carolina State Bar. Additionally, a required fee pursuant to N.C. Gen. Stat. § 84-4.1 is being forwarded simultaneously to the Clerk of Wake County in the total amount of \$1,350 (\$225.00 per applicant) for the *pro hac* admission of Applicants.

WHEREFORE, for the reasons set forth herein, Movants respectfully request the Court to allow this motion for admission of R. Stanton Jones, Elisabeth Theodore, and Daniel Jacobson, William Perdue, Sara Murphy D'Amico, and Graham White of the law firm Arnold & Porter Kaye Scholer LLP in this action *pro hac vice*.

Respectfully submitted this the 7th of October, 2019.

PATTERSON HARKAVY LLP

By:  _____

Burton Craige

N.C. State Bar No. 9180

bcrage@pathlaw.com

Narendra K. Ghosh

N.C. State Bar No. 37649

nghosh@pathlaw.com

Paul E. Smith

N.C. State Bar No. 45014

100 Europa Dr., Suite 420

Chapel Hill, NC 27517

Telephone: 919.942.5200

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing to counsel for Defendants North Carolina State Board of Elections and its members via *e-mail*, and served a copy of the foregoing to the remaining defendants by *U.S. mail*, addressed to the following persons at the following addresses which are the last addresses known to me:

Warren Daniel
300 N. Salisbury Street
Rm. 627
Raleigh, N.C. 27603

Paul Newton
300 N. Salisbury Street
Rm. 312
Raleigh, N.C. 27603

David R. Lewis
16 West Jones Street
Rm. 2301
Raleigh, N.C. 27601

Ralph E. Hise
300 N. Salisbury St.
Rm. 300-A
Raleigh, N.C. 27603

Timothy K. Moore
16 West Jones Street
Rm. 2304
Raleigh, N.C. 27601

Philip E. Berger
16 West Jones Street
Rm. 2007
Raleigh, N.C. 27601

This the 7 day of October, 2019.



Burton Craige, NC Bar No. 9180

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REPRESENTATIVES TIMOTHY K.
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THE NORTH CAROLINA SENATE PHILIP
E. BERGER; THE NORTH CAROLINA
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CIRCOSTA, IN HIS OFFICIAL CAPACITY
AS CHAIRMAN OF THE NORTH
CAROLINA STATE BOARD OF

ORDER GRANTING
MOTION FOR ADMISSION OF
COUNSEL *PRO HAC VICE*

This cause coming on to be heard before the undersigned on the motion of Burton Craige, Narendra K. Ghosh and Paul E. Smith, attorneys duly admitted to the Bar of the State of North Carolina, for the admission of R. Stanton Jones, Elisabeth Theodore, Daniel Jacobson, William Perdue, Sara Murphy D'Amico, and Graham White, as counsel for Plaintiffs in connection with this case.

IT IS THEREFORE ORDERED that R. Stanton Jones, Elisabeth Theodore, Daniel Jacobson, William Perdue, Sara Murphy D'Amico, and Graham White of the law firm Arnold & Porter Kaye Scholer LLP are allowed to practice in the General Court of Justice of North Carolina and appear on behalf of the Plaintiffs in the above-captioned legal proceeding.

This the ____ day of _____, 20__.

Superior Court Judge Presiding

STATE OF NORTH CAROLINA

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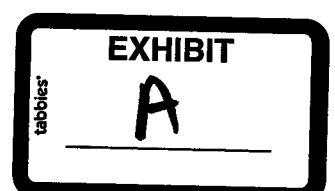
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**STATEMENT OF
R. STANTON JONES
IN SUPPORT OF MOTION FOR
ADMISSION *PRO HAC VICE***



Pursuant to N.C. Gen. Stat. § 84-4.1(3)-(6), R. Stanton Jones hereby submits the following statement in support of the Motion for his admission to practice *Pro Hac Vice*:

1. I am an Attorney in the law firm of Arnold & Porter Kaye Scholer LLP. I work at its offices located at 601 Massachusetts Avenue, NW, Washington, DC 20001. I was admitted to the Maryland Bar in December of 2007 and am an active member in good standing of the Maryland State Bar. I was admitted to the District of Columbia Bar in April of 2009 and am an active member in good standing of the District of Columbia Bar. I have also been admitted to, and am an active member in good standing of (with year of admission noted parenthetically), the United States Courts of Appeals for the Second Circuit (2015), Third Circuit (2012), Fourth Circuit (2012), Fifth Circuit (2018), Sixth Circuit (2014), Seventh Circuit (2017), Ninth Circuit (2017), Eleventh Circuit (2014), District of Columbia Circuit (2012), and Federal Circuit (2015) Circuit, as well as the United States District Court for the District of Columbia (2009) and the Supreme Court of the United States (2016). I am actively engaged in the practice of law in litigation matters.

2. I have not been subjected to any public discipline by any court or lawyer regulatory organization or had any *Pro Hac Vice* admission revoked.

3. Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Jackson Thomas Dunn, Jr., Mark S. Peters, Joseph Thomas Gates, Kathleen Barnes, Virginia Walters Brien and David Dwight Brown have retained my law firm, Arnold & Porter Kaye Scholer LLP, and me to represent them in connection with the above-captioned proceeding.

4. I will continue to represent Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Jackson Thomas Dunn, Jr., Mark S. Peters, Joseph Thomas Gates, Kathleen Barnes,


Virginia Walters Brien and David Dwight Brown in connection with the above-captioned action until a final determination is reached or I am permitted by order of this Court to withdraw from representation.

5. I agree to be subject to the orders and amenable to the disciplinary action and the civil jurisdiction of the North Carolina General Court of Justice and the North Carolina State Bar with respect to all matters incident to this proceeding as if I were a regularly admitted and licensed member of the North Carolina Bar in good standing.

6. The Maryland State Bar grants like privileges to practice on a *Pro Hac Vice* basis to members of the North Carolina State Bar in good standing.

7. I have associated and am personally appearing with Burton Craige, Narendra K. Ghosh and Paul E. Smith in this action. Mr. Craige, Ms. Ghosh and Mr. Smith are attorneys practicing law with Patterson Harkavy LLP in Chapel Hill, North Carolina, are duly and legally admitted to practice in the General Court of Justice of North Carolina, and are residents of North Carolina. Service of legal proceedings and disciplinary matters may be had upon them in this action with the same effect as if personally made upon me.

Respectfully submitted, this the 1 day of October, 2019.



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stantonjones@arnoldporter.com

STATE OF NORTH CAROLINA

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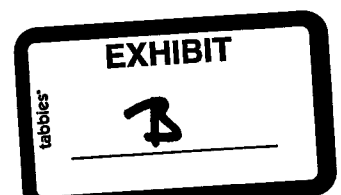
REBECCA HARPER; AMY CLARE
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**STATEMENT OF
ELISABETH S. THEODORE
IN SUPPORT OF MOTION FOR
ADMISSION *PRO HAC VICE***



Pursuant to N.C. Gen. Stat. § 84-4.1(3)-(6), Elisabeth S. Theodore hereby submits the following statement in support of the Motion for her admission to practice *Pro Hac Vice*:

1. I am an Attorney in the law firm of Arnold & Porter Kaye Scholer LLP. I work at its offices located at 601 Massachusetts Avenue, NW, Washington, DC 20001. I was admitted to the Maryland Bar in December of 2011 and am an active member in good standing of the Maryland State Bar. I was admitted to the District of Columbia State Bar in June of 2014 and am an active member in good standing of the District of Columbia State Bar. I have also been admitted to, and am an active member in good standing of, the Bar of the United States Courts of Appeals for the Second (2017), Third (2018), Sixth (2014), Seventh (2017), Ninth (2015), and District of Columbia (2014) Circuits. Additionally, I have been admitted to the United States District Court for the District of Columbia (2017) and the Supreme Court of the United States (2016). I am actively engaged in the practice of law in appellate and litigation matters.

2. I have not been subjected to any public discipline by any court or lawyer regulatory organization or had any *Pro Hac Vice* admission revoked.

3. Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Jackson Thomas Dunn, Jr., Mark S. Peters, Joseph Thomas Gates, Kathleen Barnes, Virginia Walters Brien and David Dwight Brown have retained my law firm, Arnold & Porter Kaye Scholer LLP, and me to represent them in connection with the above-captioned proceeding.

4. I will continue to represent Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Jackson Thomas Dunn, Jr., Mark S. Peters, Joseph Thomas Gates, Kathleen Barnes, Virginia Walters Brien

and David Dwight Brown in connection with the above-captioned action until a final determination is reached or I am permitted by order of this Court to withdraw from representation.

5. I agree to be subject to the orders and amenable to the disciplinary action and the civil jurisdiction of the North Carolina General Court of Justice and the North Carolina State Bar with respect to all matters incident to this proceeding as if I were a regularly admitted and licensed member of the North Carolina Bar in good standing.

6. The Maryland State Bar grants like privileges to practice on a *Pro Hac Vice* basis to members of the North Carolina State Bar in good standing.

7. I have associated and am personally appearing with Burton Craige, Narendra K. Ghosh and Paul E. Smith in this action. Mr. Craige, Ms. Ghosh and Mr. Smith are attorneys practicing law with Patterson Harkavy LLP in Chapel Hill, North Carolina, are duly and legally admitted to practice in the General Court of Justice of North Carolina, and are residents of North Carolina. Service of legal proceedings and disciplinary matters may be had upon them in this action with the same effect as if personally made upon me.

Respectfully submitted, this the ^{21st} day of September, 2019.



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STATE OF NORTH CAROLINA

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**STATEMENT OF
DANIEL JACOBSON
IN SUPPORT OF MOTION FOR
ADMISSION *PRO HAC VICE***



Pursuant to N.C. Gen. Stat. § 84-4.1(3)-(6), Daniel Jacobson hereby submits the following statement in support of the Motion for his admission to practice *Pro Hac Vice*:

1. I am an Attorney in the law firm of Arnold & Porter Kaye Scholer LLP. I work at its offices located at 601 Massachusetts Avenue, NW, Washington, DC 20001. I was admitted to the New York Bar in May of 2012 and am an active member in good standing of the New York State Bar. I was admitted to the District of Columbia State Bar in October of 2013 and am an active member in good standing of the District of Columbia State Bar. I have also been admitted to, and am an active member in good standing of, the Bar of the United States Courts of Appeals for the Third (2018), Fourth (2014), and Fifth (2014) Circuits. Additionally, I have been admitted to United States District Court for the District of Columbia (2017). I am actively engaged in the practice of law in appellate and litigation matters.

2. I have not been subjected to any public discipline by any court or lawyer regulatory organization or had any *Pro Hac Vice* admission revoked.

3. Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Jackson Thomas Dunn, Jr., Mark S. Peters, Joseph Thomas Gates, Kathleen Barnes, Virginia Walters Brien and David Dwight Brown have retained my law firm, Arnold & Porter Kaye Scholer LLP, and me to represent them in connection with the above-captioned proceeding.


4. I will continue to represent Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Jackson Thomas Dunn, Jr., Mark S. Peters, Joseph Thomas Gates, Kathleen Barnes, Virginia Walters Brien and David Dwight Brown in connection with the above-captioned action until a final determination is reached or I am permitted by order of this Court to withdraw from representation.

5. I agree to be subject to the orders and amenable to the disciplinary action and the civil jurisdiction of the North Carolina General Court of Justice and the North Carolina State Bar with respect to all matters incident to this proceeding as if I were a regularly admitted and licensed member of the North Carolina Bar in good standing.

6. The New York State Bar grants like privileges to practice on a *Pro Hac Vice* basis to members of the North Carolina State Bar in good standing.

7. I have associated and am personally appearing with Burton Craige, Narendra K. Ghosh and Paul E. Smith in this action. Mr. Craige, Ms. Ghosh and Mr. Smith are attorneys practicing law with Patterson Harkavy LLP in Chapel Hill, North Carolina, are duly and legally admitted to practice in the General Court of Justice of North Carolina, and are residents of North Carolina. Service of legal proceedings and disciplinary matters may be had upon them in this action with the same effect as if personally made upon me.

Respectfully submitted, this the 1st day of October, 2019.



Daniel F. Jacobson
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**STATEMENT OF
SARA MURPHY D'AMICO
IN SUPPORT OF MOTION FOR
ADMISSION PRO HAC VICE**



Pursuant to N.C. Gen. Stat. § 84-4.1(3)-(6), Sara Murphy D'Amico hereby submits the following statement in support of the Motion for her admission to practice *pro hac*:

1. I am an Attorney in the law firm of Arnold & Porter Kaye Scholer LLP. I work at its offices located at 601 Massachusetts Ave., NW Washington, D.C. 20001. I was admitted to the Massachusetts Bar in July 2017, and am an active member in good standing of the Massachusetts Bar. I was admitted to the District of Columbia Bar in January 2018, and am an active member in good standing of the District of Columbia Bar. I have also been admitted to, and am an active member in good standing of (with year of admission noted parenthetically): the United States Court of Appeals for the Third Circuit (2018), the United States Court of Appeals for the Fourth Circuit (2019) and the United States District Court for the District of Columbia (2018). I am actively engaged in the practice of law in litigation matters.

2. I have not been subjected to any public discipline by any court or lawyer regulatory organization or had any *pro hac vice* admission revoked.

3. Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Jackson Thomas Dunn, Jr., Mark S. Peters, Joseph Thomas Gates, Kathleen Barnes, Virginia Walters Brien and David Dwight Brown have retained my law firm, Arnold & Porter Kaye Scholer LLP, and me to represent them in connection with the above-captioned proceeding.

4. I will continue to represent Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Jackson Thomas Dunn, Jr., Mark S. Peters, Joseph Thomas Gates, Kathleen Barnes, Virginia Walters Brien and David Dwight Brown in connection with the above-captioned action until a final determination is reached or I am permitted by order of this Court to withdraw from representation.

5. I agree to be subject to the orders and amenable to the disciplinary action and the civil jurisdiction of the North Carolina General Court of Justice and the North Carolina State Bar with respect to all matters incident to this proceeding as if I were a regularly admitted and licensed member of the North Carolina Bar in good standing.

6. The Massachusetts Bar grants like privileges to practice on a *pro hac vice* basis to members of the North Carolina Bar in good standing.

7. I have associated and am personally appearing with Burton Craige, Narendra K. Ghosh and Paul E. Smith in this action. Mr. Craige, Ms. Ghosh and Mr. Smith are attorneys practicing law with Patterson Harkavy LLP in Chapel Hill, North Carolina, are duly and legally admitted to practice in the General Court of Justice of North Carolina, and are residents of North Carolina. Service of legal proceedings and disciplinary matters may be had upon them in this action with the same effect as if personally made upon me.

Respectfully submitted, this the 1 day of October, 2019.

A handwritten signature in black ink, appearing to read "Sara D'Amico", written over a horizontal line.

Sara Murphy D'Amico*
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**STATEMENT OF
WILLIAM PERDUE
IN SUPPORT OF MOTION FOR
ADMISSION PRO HAC VICE**



Pursuant to N.C. Gen. Stat. § 84-4.1(3)-(6), William Perdue hereby submits the following statement in support of the Motion for his admission to practice *Pro Hac Vice*:

1. I am an Attorney in the law firm of Arnold & Porter Kaye Scholer LLP. I work at its offices located at 601 Massachusetts Ave., NW Washington, D.C. 20001. I was admitted to the District of Columbia Bar in October of 2013, and am an active member in good standing of the District of Columbia Bar. I was admitted to the New York State Bar in January 2012, and am a member in good standing of the New York State Bar. I have also been admitted to, and am an active member in good standing of (with year of admission noted parenthetically), the Bar of the United States Court of Appeals for the Second Circuit (2015), the Fourth Circuit (2017), the Fifth Circuit (2018), the Sixth Circuit (2015), the Seventh Circuit (2017), the Ninth Circuit (2015), and the Eleventh Circuit (2016), and the D.C. Circuit (2019). I am actively engaged in the practice of law in appellate and litigation matters.

2. I have not been subjected to any public discipline by any court or lawyer regulatory organization or had any *Pro Hac Vice* admission revoked.

3. Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Jackson Thomas Dunn, Jr., Mark S. Peters, Joseph Thomas Gates, Kathleen Barnes, Virginia Walters Brien and David Dwight Brown have retained my law firm, Arnold & Porter Kaye Scholer LLP, and me to represent them in connection with the above-captioned proceeding.

4. I will continue to represent Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Jackson Thomas Dunn, Jr., Mark S. Peters, Joseph Thomas Gates, Kathleen Barnes, Virginia Walters Brien and David Dwight Brown in connection with the above-captioned action until a

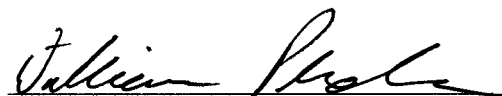
final determination is reached or I am permitted by order of this Court to withdraw from representation.

5. I agree to be subject to the orders and amenable to the disciplinary action and the civil jurisdiction of the North Carolina General Court of Justice and the North Carolina State Bar with respect to all matters incident to this proceeding as if I were a regularly admitted and licensed member of the North Carolina Bar in good standing.

6. The District of Columbia and New York State Bars grant like privileges to practice on a *Pro Hac Vice* basis to members of the North Carolina State Bar in good standing.

7. I have associated and am personally appearing with Burton Craige, Narendra K. Ghosh and Paul E. Smith in this action. Mr. Craige, Ms. Ghosh and Mr. Smith are attorneys practicing law with Patterson Harkavy LLP in Chapel Hill, North Carolina, are duly and legally admitted to practice in the General Court of Justice of North Carolina, and are residents of North Carolina. Service of legal proceedings and disciplinary matters may be had upon them in this action with the same effect as if personally made upon me.

Respectfully submitted, this the 1st day of October, 2019.



William Perdue*

State Bar No. 995365

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STATE OF NORTH CAROLINA

COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE

SUPERIOR COURT DIVISION

Docket No. 19 CVS 012667

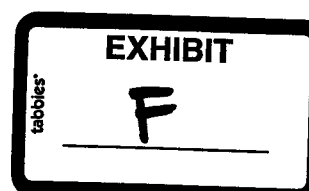
REBECCA HARPER; AMY CLARE
OSEROFF; DONALD RUMPH; JOHN
BALLA; RICHARD R. CREWS; LILY
NICOLE QUICK; GETTYS COHEN JR.;
SHAWN RUSH; JACKSON THOMAS
DUNN, JR.; MARK S. PETERS; JOSEPH
THOMAS GATES; KATHLEEN BARNES;
VIRGINIA WALTERS BRIEN; DAVID
DWIGHT BROWN,

Plaintiffs,

v.

REPRESENTATIVE DAVID R. LEWIS, IN
HIS OFFICIAL CAPACITY AS SENIOR
CHAIR OF THE HOUSE STANDING
COMMITTEE ON REDISTRICTING;
RALPH HISE, IN HIS OFFICIAL
CAPACITY AS CO-CHAIR OF THE
SENATE STANDING COMMITTEE ON
REDISTRICTING; WARREN DANIEL, IN
HIS OFFICIAL CAPACITY AS CO-CHAIR
OF THE SENATE STANDING
COMMITTEE ON REDISTRICTING; PAUL
NEWTON, IN HIS OFFICIAL CAPACITY
AS CO-CHAIR OF THE SENATE
STANDING COMMITTEE ON
REDISTRICTING; SPEAKER OF THE
NORTH CAROLINA HOUSE OF
REPRESENTATIVES TIMOTHY K.
MOORE; PRESIDENT PRO TEMPORE OF
THE NORTH CAROLINA SENATE PHILIP
E. BERGER; THE NORTH CAROLINA
STATE BOARD OF ELECTIONS; DAMON
CIRCOSTA, IN HIS OFFICIAL CAPACITY
AS CHAIRMAN OF THE NORTH
CAROLINA STATE BOARD OF

**STATEMENT OF
GRAHAM WHITE
IN SUPPORT OF MOTION FOR
ADMISSION PRO HAC VICE**



Pursuant to N.C. Gen. Stat. § 84-4.1(3)-(6), Graham White hereby submits the following statement in support of the Motion for his admission to practice *Pro Hac Vice*:

1. I am an Attorney in the law firm of Arnold & Porter Kaye Scholer LLP. I work at its offices located at 601 Massachusetts Avenue, NW, Washington, DC 20001. I was admitted to the Maryland Bar in December of 2016 and am an active member in good standing of the Maryland State Bar. I was admitted to the District of Columbia Bar in May of 2019 and am an active member in good standing of the District of Columbia Bar. I have also been admitted to, and am an active member in good standing of (with year of admission noted parenthetically), the United States District Court for the District of Columbia (2016). I am actively engaged in the practice of law in litigation matters.

2. I have not been subjected to any public discipline by any court or lawyer regulatory organization or had any *Pro Hac Vice* admission revoked.

3. Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Jackson Thomas Dunn, Jr., Mark S. Peters, Joseph Thomas Gates, Kathleen Barnes, Virginia Walters Brien and David Dwight Brown have retained my law firm, Arnold & Porter Kaye Scholer LLP, and me to represent them in connection with the above-captioned proceeding.

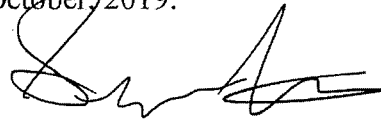
4. I will continue to represent Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Jackson Thomas Dunn, Jr., Mark S. Peters, Joseph Thomas Gates, Kathleen Barnes, Virginia Walters Brien and David Dwight Brown in connection with the above-captioned action until a final determination is reached or I am permitted by order of this Court to withdraw from representation.

5. I agree to be subject to the orders and amenable to the disciplinary action and the civil jurisdiction of the North Carolina General Court of Justice and the North Carolina State Bar with respect to all matters incident to this proceeding as if I were a regularly admitted and licensed member of the North Carolina Bar in good standing.

6. The District of Columbia and Maryland State Bars grant like privileges to practice on a *Pro Hac Vice* basis to members of the North Carolina State Bar in good standing.

7. I have associated and am personally appearing with Burton Craige, Narendra K. Ghosh and Paul E. Smith in this action. Mr. Craige, Ms. Ghosh and Mr. Smith are attorneys practicing law with Patterson Harkavy LLP in Chapel Hill, North Carolina, are duly and legally admitted to practice in the General Court of Justice of North Carolina, and are residents of North Carolina. Service of legal proceedings and disciplinary matters may be had upon them in this action with the same effect as if personally made upon me.

Respectfully submitted, this the 1st day of October, 2019.



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Graham.White@arnoldporter.com

NORTH CAROLINA

WAKE COUNTY

REBECCA HARPER, et al.,

Plaintiffs,

v.

REPRESENTATIVE DAVID R. LEWIS,
IN HIS OFFICIAL CAPACITY AS
SENIOR CHAIRMAN OF THE HOUSE
SELECT COMMITTEE ON
REDISTRICTING, et al.,

Defendants.

GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
19-cv-012667

**STATEMENT IN SUPPORT OF
ADMISSION PRO HAC VICE**

NOW COMES John Balla and in support of the Motions for Admission of R. Stanton Jones, Elisabeth S. Theodore, Daniel F. Jacobson, William Perdue, Sara Murphy D'Amico, and Graham White *Pro Hac Vice*, shows the Court as follows:

1. My address is 7353 Newport Ave., Raleigh, NC 27613; and
2. I have retained R. Stanton Jones, Elisabeth S. Theodore, Daniel F. Jacobson, William Perdue, Sara Murphy D'Amico, and Graham White of the law firm of Arnold & Porter Kaye Scholer LLP to represent me in the above-captioned action.

This the 1st day of October, 2019.

John Balla

EXHIBIT

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