

SUPREME COURT OF NORTH CAROLINA

REBECCA HARPER, et al.,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his
official capacity as Chair of the House
Standing Committee on Redistricting, et al.,

Defendants.

NORTH CAROLINA LEAGUE OF
CONSERVATION VOTERS, INC., et al.,

COMMON CAUSE,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his
official capacity as Chair of the House
Standing Committee on Redistricting, et al.,

Defendants.

From Wake County

MOTION FOR ADMISSION OF COUNSEL PRO HAC VICE

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 Elisabeth S. Theodore, R. Stanton Jones, and Samuel F. Callahan of the law firm Arnold & Porter Kaye Scholer LLP, and Abha Khanna, Lalitha D. Madduri, Jacob D. Shelly, and Graham W. White of the law firm Elias Law Group LLP (“Applicants”), to appear *pro hac vice* on behalf of the Harper Plaintiffs in this proceeding.¹ 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, B, C, D, E, F, and G**, respectively, set forth their qualifications to appear in this case pursuant to N.C. Gen. Stat. § 84-4.1.
2. The Applicants and their law firms are counsel of choice for the Harper Plaintiffs. A statement attesting to the retention of the Applicants and their law firms is attached to this Motion as **Exhibit H**.
3. Applicants were admitted *pro hac vice* to practice in the General Court of Justice of North Carolina in this case by orders of the Wake County Superior Court on December 2, December 3, and December 30, 2021.

¹ The Harper Plaintiffs are Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Anthony Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Mark S. Peters, Kathleen Barnes, Virginia Walters Brien, David Dwight Brown, Eileen Stephens, Barbara Proffitt, Mary Elizabeth Voss, Chenita Barber Johnson, Sarah Taber, Joshua Perry Brown, Laureen Flood, Donald M. MacKinnon, Ronald Gray Osborne, Jr., Ann Butzner, Sondra Stein, Bobby Jones, and Kristiann Herring.

4. Pursuant to N.C. Gen. Stat. § 84-4.1(5), as local counsel in this matter and residents of North Carolina, Mr. Craige, Mr. Ghosh, and Mr. Smith agree to be responsible for filing the required registration statement for Applicants with the North Carolina State Bar. Additionally, the required fee pursuant to N.C. Gen. Stat. § 84-4.1 is being forwarded simultaneously to the Clerk of the North Carolina Supreme Court in the total amount of \$1,575.00 (\$225.00 per applicant) for the *pro hac vice* admission of Applicants.

5. Movants have conferred with counsel for the other parties regarding this motion. The other parties consent to the *pro hac vice* admission of Applicants in this Court.

WHEREFORE, for the reasons set forth herein, Movants respectfully request the Court to allow this motion for admission of Elisabeth S. Theodore, R. Stanton Jones, and Samuel F. Callahan of the law firm Arnold & Porter Kaye Scholer LLP, and Abha Khanna, Lalitha D. Madduri, Jacob D. Shelly, and Graham W. White of the law firm Elias Law Group LLP in this action *pro hac vice*.

Respectfully submitted this 20th day of January, 2022.

PATTERSON HARKAVY LLP

Electronically submitted

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N.C. R. App. P. 33(b) Certification:
I certify that all of the attorneys listed
have authorized me to list their names on
this document as if they had personally
signed it.

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Counsel for Harper Plaintiffs

CERTIFICATE OF SERVICE

Pursuant to North Carolina Rule of Appellate Procedure 26, I hereby certify that I have this day served a copy of the foregoing by email, addressed to the following counsel:

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Counsel for NCLCV Plaintiffs

This the 20th day of January, 2022.

Electronically submitted
Narendra K. Ghosh

Exhibit A

SUPREME COURT OF NORTH CAROLINA

REBECCA HARPER, et al.,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his official
capacity as Chair of the House Standing Committee on
Redistricting, et al.,

Defendants.

NORTH CAROLINA LEAGUE OF CONSERVATION
VOTERS, INC., et al.,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his official
capacity as Chair of the House Standing Committee on
Redistricting, et al.,

Defendants.

**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 Bar in June of 2014 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 Bar of the United States Courts of Appeals for the First Circuit (2019), Second Circuit (2017), Third Circuit (2018), Fourth Circuit (2019), Fifth Circuit (2019), Sixth Circuit (2014), Seventh Circuit (2017), Eighth Circuit (2020), Ninth Circuit (2015), Tenth Circuit (2020), Eleventh Circuit (2020), District of Columbia Circuit (2014), and Federal Circuit (2020). 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 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 Anthony Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Mark S. Peters, Kathleen Barnes, Virginia Walters Brien, David Dwight Brown, Eileen Stephens, Barbara Proffitt, Mary Elizabeth Voss, Chenita Barber Johnson, Sarah Taber, Joshua Perry Brown, Laureen Flood, Donald M. MacKinnon, Ronald Gray Osborne, Jr., Ann Butzner, Sondra Stein, Bobby Jones, and Kristiann Herring 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 Anthony Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Mark S. Peters, Kathleen Barnes, Virginia Walters Brien, David Dwight Brown, Eileen Stephens, Barbara Proffitt, Mary Elizabeth Voss, Chenita Barber Johnson, Sarah Taber,

Joshua Perry Brown, Laureen Flood, Donald M. MacKinnon, Ronald Gray Osborne, Jr., Ann Butzner, Sondra Stein, Bobby Jones, and Kristiann Herring 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 19th day of January, 2022.



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Exhibit B

SUPREME COURT OF NORTH CAROLINA

REBECCA HARPER, et al.,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his official
capacity as Chair of the House Standing Committee on
Redistricting, et al.,

Defendants.

NORTH CAROLINA LEAGUE OF CONSERVATION
VOTERS, INC., et al.,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his official
capacity as Chair of the House Standing Committee on
Redistricting, et al.,

Defendants.

**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 First Circuit (2019), Second Circuit (2015), Third Circuit (2012), Fourth Circuit (2012), Fifth Circuit (2018), Sixth Circuit (2014), Seventh Circuit (2017), Eighth Circuit (2019), Ninth Circuit (2017), Tenth Circuit (2020), Eleventh Circuit (2014), District of Columbia Circuit (2012), and Federal Circuit (2015), as well as the United States District Courts for the District of Columbia (2009) and District of Maryland (2018), 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 Anthony Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Mark S. Peters, Kathleen Barnes, Virginia Walters Brien, David Dwight Brown, Eileen Stephens, Barbara Proffitt, Mary Elizabeth Voss, Chenita Barber Johnson, Sarah Taber, Joshua Perry Brown, Laureen Flood, Donald M. MacKinnon, Ronald Gray Osborne, Jr., Ann Butzner, Sondra Stein, Bobby Jones, and Kristiann Herring 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 Anthony Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Mark S. Peters, Kathleen Barnes, Virginia Walters Brien, David Dwight Brown, Eileen Stephens, Barbara Proffitt, Mary Elizabeth Voss, Chenita Barber Johnson, Sarah Taber,

Joshua Perry Brown, Laureen Flood, Donald M. MacKinnon, Ronald Gray Osborne, Jr., Ann Butzner, Sondra Stein, Bobby Jones, and Kristiann Herring 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 19th day of January, 2022.



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Exhibit C

SUPREME COURT OF NORTH CAROLINA

REBECCA HARPER, et al.,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his official
capacity as Chair of the House Standing Committee on
Redistricting, et al.,

Defendants.

NORTH CAROLINA LEAGUE OF CONSERVATION
VOTERS, INC., et al.,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his official
capacity as Chair of the House Standing Committee on
Redistricting, et al.,

Defendants.

**STATEMENT OF
SAMUEL F. CALLAHAN IN
SUPPORT OF MOTION FOR
ADMISSION *PRO HAC VICE***

Pursuant to N.C. Gen. Stat. § 84-4.1(3)-(6), Samuel F. Callahan 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 January of 2017 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 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 Courts of Appeals for the First Circuit (2020), Second Circuit (2019), Third Circuit (2019), Fourth Circuit (2017), Fifth Circuit (2020), Seventh Circuit (2019), Ninth Circuit (2019), Eleventh Circuit (2021), and District of Columbia Circuit (2020), as well as the United States District Courts for the District of Columbia (2018) and District of Maryland (2017). 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 Anthony Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Mark S. Peters, Kathleen Barnes, Virginia Walters Brien, David Dwight Brown, Eileen Stephens, Barbara Proffitt, Mary Elizabeth Voss, Chenita Barber Johnson, Sarah Taber, Joshua Perry Brown, Laureen Flood, Donald M. MacKinnon, Ronald Gray Osborne, Jr., Ann Butzner, Sondra Stein, Bobby Jones, and Kristiann Herring 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 Anthony Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Mark S. Peters, Kathleen Barnes, Virginia Walters Brien, David Dwight Brown, Eileen Stephens, Barbara Proffitt, Mary Elizabeth Voss, Chenita Barber Johnson, Sarah Taber, Joshua Perry Brown, Laureen Flood, Donald M. MacKinnon, Ronald Gray Osborne, Jr., Ann

Butzner, Sondra Stein, Bobby Jones, and Kristiann Herring 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 19th day of January, 2022.



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Exhibit D

SUPREME COURT OF NORTH CAROLINA

REBECCA HARPER, et al.,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his official
capacity as Chair of the House Standing Committee on
Redistricting, et al.,

Defendants.

NORTH CAROLINA LEAGUE OF CONSERVATION
VOTERS, INC., et al.,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his official
capacity as Chair of the House Standing Committee on
Redistricting, et al.,

Defendants.

**STATEMENT OF ABHA
KHANNA IN SUPPORT OF
MOTION FOR ADMISSION
*PRO HAC VICE***

NOW COMES Abha Khanna (“Petitioner”) and respectfully moves this Court, pursuant to N.C. Gen. Stat. § 84-4.1, for admission *pro hac vice* so that she may represent Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Anthony Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Mark S. Peters, Kathleen Barnes, Virginia Walters Brien, David Dwight Brown, Eileen Stephens, Barbara Proffitt, Mary Elizabeth Voss, Chenita

Barber Johnson, Sarah Taber, Joshua Perry Brown, Laureen Flood, Donald M. MacKinnon, Ronald Gray Osborne, Jr., Ann Butzner, Sondra Stein, Bobby Jones, and Kristiann Herring in the above-captioned matter. In support of this application, Petitioner certifies that:

1. I am a partner with the law firm of Elias Law Group LLP. I work at its offices located at 1700 Seventh Ave., Suite 2100, Seattle, WA 98101. I am admitted to the New York Bar (#4585493) and to the Washington State Bar (#42612). Additionally, I have been admitted to the United States Supreme Court, the United States District Courts for the Western and Eastern Districts of Washington and the United States Court of Appeals for the Fourth, Eighth, Ninth and Eleventh Circuits. I am in good standing and eligible to practice in all courts to which I am admitted.

2. Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Anthony Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Mark S. Peters, Kathleen Barnes, Virginia Walters Brien, David Dwight Brown, Eileen Stephens, Barbara Proffitt, Mary Elizabeth Voss, Chenita Barber Johnson, Sarah Taber, Joshua Perry Brown, Laureen Flood, Donald M. MacKinnon, Ronald Gray Osborne, Jr., Ann Butzner, Sondra Stein, Bobby Jones, and Kristiann Herring have retained my law firm, Elias Law Group LLP, and me to represent them in connection with the above-captioned proceeding.

3. I will continue to represent Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Anthony Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Mark S. Peters, Kathleen Barnes, Virginia Walters Brien, David Dwight Brown, Eileen Stephens, Barbara Proffitt, Mary Elizabeth Voss, Chenita Barber Johnson, Sarah Taber, Joshua Perry Brown, Laureen Flood, Donald M. MacKinnon, Ronald Gray Osborne, Jr., Ann Butzner, Sondra Stein, Bobby Jones, and Kristiann Herring 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.

4. 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.

5. I am admitted to practice in New York, a jurisdiction that grants like privileges to practice on a *pro hac vice* basis to members of the North Carolina State Bar in good standing.

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

7. I have associated and am personally appearing with Burton Craige, Narendra K. Ghosh and Paul E. Smith in this action. Mr. Craige, Mr. 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.

Therefore, I respectfully request that the Court grant this request for admission *pro hac vice* so that I may represent the interest of Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Anthony Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Mark S. Peters, Kathleen Barnes, Virginia Walters Brien, David Dwight Brown, Eileen Stephens, Barbara Proffitt, Mary Elizabeth Voss, Chenita Barber Johnson, Sarah Taber, Joshua Perry Brown, Laureen Flood, Donald M. MacKinnon, Ronald Gray Osborne, Jr., Ann Butzner, Sondra Stein, Bobby Jones, and Kristiann Herring.

DATED this 19th day of January, 2022.

ELIAS LAW GROUP LLP



By: _____

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Exhibit E

SUPREME COURT OF NORTH CAROLINA

REBECCA HARPER, et al.,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his official
capacity as Chair of the House Standing Committee on
Redistricting, et al.,

Defendants.

NORTH CAROLINA LEAGUE OF CONSERVATION
VOTERS, INC., et al.,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his official
capacity as Chair of the House Standing Committee on
Redistricting, et al.,

Defendants.

**STATEMENT OF LALITHA
MADDURI IN SUPPORT OF
MOTION FOR ADMISSION
*PRO HAC VICE***

NOW COMES Lalitha Madduri (“Petitioner”) and respectfully moves this Court, pursuant to N.C. Gen. Stat. § 84-4.1, for admission *pro hac vice* so that she may represent Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Anthony Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Mark S. Peters, Kathleen Barnes, Virginia Walters Brien, David Dwight Brown, Eileen Stephens, Barbara Proffitt, Mary Elizabeth Voss, Chenita

Barber Johnson, Sarah Taber, Joshua Perry Brown, Laureen Flood, Donald M. MacKinnon, Ronald Gray Osborne, Jr., Ann Butzner, Sondra Stein, Bobby Jones, and Kristiann Herring in the above-captioned matter. In support of this application, Petitioner certifies that:

1. I am counsel with the law firm of Elias Law Group LLP. I work at its offices located at 10 G St NE, Suite 600, Washington, DC 20002. I am admitted to the District of Columbia Bar (#1659412) and to the California State Bar (#301236). Additionally, I have been admitted to the United States Supreme Court, the United States Circuit Courts for the Third, Fourth, Fifth, and Eleventh Circuits, and the United States District Courts for the District of Columbia and the Central District of California. I am in good standing and eligible to practice in all courts to which I am admitted.

2. Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Anthony Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Mark S. Peters, Kathleen Barnes, Virginia Walters Brien, David Dwight Brown, Eileen Stephens, Barbara Proffitt, Mary Elizabeth Voss, Chenita Barber Johnson, Sarah Taber, Joshua Perry Brown, Laureen Flood, Donald M. MacKinnon, Ronald Gray Osborne, Jr., Ann Butzner, Sondra Stein, Bobby Jones, and Kristiann Herring have retained my law firm, Elias Law Group LLP, and me to represent them in connection with the above-captioned proceeding.

3. I will continue to represent Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Anthony Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Mark S. Peters, Kathleen Barnes, Virginia Walters Brien, David Dwight Brown, Eileen Stephens, Barbara Proffitt, Mary Elizabeth Voss, Chenita Barber Johnson, Sarah Taber, Joshua Perry Brown, Laureen Flood, Donald M. MacKinnon, Ronald Gray Osborne, Jr., Ann Butzner, Sondra Stein, Bobby Jones, and Kristiann Herring 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.

4. 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.

5. I am admitted to practice in the District of Columbia, a jurisdiction that grants like privileges to practice on a *pro hac vice* basis to members of the North Carolina State Bar in good standing.

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

7. I have associated and am personally appearing with Burton Craige, Narendra K. Ghosh and Paul E. Smith in this action. Mr. Craige, Mr. 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.

Therefore, I respectfully request that the Court grant this request for admission *pro hac vice* so that I may represent the interest of Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Anthony Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Mark S. Peters, Kathleen Barnes, Virginia Walters Brien, David Dwight Brown, Eileen Stephens, Barbara Proffitt, Mary Elizabeth Voss, Chenita Barber Johnson, Sarah Taber, Joshua

Perry Brown, Laureen Flood, Donald M. MacKinnon, Ronald Gray Osborne, Jr., Ann Butzner,
Sondra Stein, Bobby Jones, and Kristiann Herring.

DATED this 19TH day of JANUARY, 2022.

ELIAS LAW GROUP LLP

By: _____

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Exhibit F

SUPREME COURT OF NORTH CAROLINA

REBECCA HARPER, et al.,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his official
capacity as Chair of the House Standing Committee on
Redistricting, et al.,

Defendants.

NORTH CAROLINA LEAGUE OF CONSERVATION
VOTERS, INC., et al.,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his official
capacity as Chair of the House Standing Committee on
Redistricting, et al.,

Defendants.

**STATEMENT OF JACOB
SHELLY IN SUPPORT OF
MOTION FOR ADMISSION
*PRO HAC VICE***

NOW COMES Jacob Shelly (“Petitioner”) and respectfully moves this Court, pursuant to N.C. Gen. Stat. § 84-4.1, for admission *pro hac vice* so that she may represent Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Anthony Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Mark S. Peters, Kathleen Barnes, Virginia Walters Brien, David Dwight Brown, Eileen Stephens, Barbara Proffitt, Mary Elizabeth Voss, Chenita

Barber Johnson, Sarah Taber, Joshua Perry Brown, Laureen Flood, Donald M. MacKinnon, Ronald Gray Osborne, Jr., Ann Butzner, Sondra Stein, Bobby Jones, and Kristiann Herring in the above-captioned matter. In support of this application, Petitioner certifies that:

1. I am an associate with the law firm of Elias Law Group LLP. I work at its offices located at 10 G St NE, Suite 600, Washington, DC 20002. I am admitted to the Maryland State Bar. Additionally, I have been admitted to the United States Circuit Court for the Third Circuit, and the United States District Court for the District of Colorado. I am in good standing and eligible to practice in all courts to which I am admitted.

2. Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Anthony Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Mark S. Peters, Kathleen Barnes, Virginia Walters Brien, David Dwight Brown, Eileen Stephens, Barbara Proffitt, Mary Elizabeth Voss, Chenita Barber Johnson, Sarah Taber, Joshua Perry Brown, Laureen Flood, Donald M. MacKinnon, Ronald Gray Osborne, Jr., Ann Butzner, Sondra Stein, Bobby Jones, and Kristiann Herring have retained my law firm, Elias Law Group LLP, and me to represent them in connection with the above-captioned proceeding.

3. I will continue to represent Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Anthony Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Mark S. Peters, Kathleen Barnes, Virginia Walters Brien, David Dwight Brown, Eileen Stephens, Barbara Proffitt, Mary Elizabeth Voss, Chenita Barber Johnson, Sarah Taber, Joshua Perry Brown, Laureen Flood, Donald M. MacKinnon, Ronald Gray Osborne, Jr., Ann Butzner, Sondra Stein, Bobby Jones, and Kristiann Herring 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.

4. 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.

5. I am admitted to practice in the State of Maryland, a jurisdiction that grants like privileges to practice on a *pro hac vice* basis to members of the North Carolina State Bar in good standing.

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

7. I have associated and am personally appearing with Burton Craige, Narendra K. Ghosh and Paul E. Smith in this action. Mr. Craige, Mr. 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.

Therefore, I respectfully request that the Court grant this request for admission *pro hac vice* so that I may represent the interest of Plaintiffs Rebecca Harper; Amy Clare Oseroff; Donald Rumph; John Anthony Balla; Richard R. Crews; Lily Nicole Quick; Gettys Cohen Jr.; Shawn Rush; Jackson Thomas Dunn, Jr.; Mark S. Peters; Kathleen Barnes; Virginia Walters Brien and David Dwight Brown.

DATED this 19th day of JANUARY, 2021.

ELIAS LAW GROUP LLP

By:  _____

Jacob Shelly
Elias Law Group LLP
10 G St NE, Suite 600
Washington, DC 20002
206-968-4490
JShelly@elias.law

Exhibit G

SUPREME COURT OF NORTH CAROLINA

REBECCA HARPER, et al.,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his official
capacity as Chair of the House Standing Committee on
Redistricting, et al.,

Defendants.

NORTH CAROLINA LEAGUE OF CONSERVATION
VOTERS, INC., et al.,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his official
capacity as Chair of the House Standing Committee on
Redistricting, et al.,

Defendants.

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

NOW COMES Graham White (“Petitioner”) and respectfully moves this Court, pursuant to N.C. Gen. Stat. § 84-4.1, for admission *pro hac vice* so that she may represent Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Anthony Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Mark S. Peters, Kathleen Barnes, Virginia Walters Brien, David Dwight Brown, Eileen Stephens, Barbara Proffitt, Mary Elizabeth Voss, Chenita

Barber Johnson, Sarah Taber, Joshua Perry Brown, Laureen Flood, Donald M. MacKinnon, Ronald Gray Osborne, Jr., Ann Butzner, Sondra Stein, Bobby Jones, and Kristiann Herring in the above-captioned matter. In support of this application, Petitioner certifies that:

1. I am an associate with the law firm of Elias Law Group LLP. I work at its offices located at 10 G St NE, Suite 600, Washington, DC 20002. I am admitted to the Maryland Bar. Additionally, I have been admitted to the United States District Court for the District of Columbia and the United States Court of Appeals for the Second, Fifth and Ninth Circuits. I am in good standing and eligible to practice in all courts to which I am admitted.

2. Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Anthony Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Mark S. Peters, Kathleen Barnes, Virginia Walters Brien, David Dwight Brown, Eileen Stephens, Barbara Proffitt, Mary Elizabeth Voss, Chenita Barber Johnson, Sarah Taber, Joshua Perry Brown, Laureen Flood, Donald M. MacKinnon, Ronald Gray Osborne, Jr., Ann Butzner, Sondra Stein, Bobby Jones, and Kristiann Herring have retained my law firm, Elias Law Group LLP, and me to represent them in connection with the above-captioned proceeding.

3. I will continue to represent Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Anthony Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Mark S. Peters, Kathleen Barnes, Virginia Walters Brien, David Dwight Brown, Eileen Stephens, Barbara Proffitt, Mary Elizabeth Voss, Chenita Barber Johnson, Sarah Taber, Joshua Perry Brown, Laureen Flood, Donald M. MacKinnon, Ronald Gray Osborne, Jr., Ann Butzner, Sondra Stein, Bobby Jones, and Kristiann Herring 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.

4. 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.

5. I am admitted to practice in New York, a jurisdiction that grants like privileges to practice on a *pro hac vice* basis to members of the North Carolina State Bar in good standing.

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

7. I have associated and am personally appearing with Burton Craige, Narendra K. Ghosh and Paul E. Smith in this action. Mr. Craige, Mr. 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.

Therefore, I respectfully request that the Court grant this request for admission *pro hac vice* so that I may represent the interest of Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Anthony Balla, Richard R. Crews, Lilly Nicole Quick, Gettys Cohen Jr., Shawn Rush, Mark S. Peters, Kathleen Barnes, Virginia Walters Brien, David Dwight Brown, Eileen Stephens, Barbara Proffitt, Mary Elizabeth Voss, Chenita Barber Johnson, Sarah Taber, Joshua Perry Brown, Laureen Flood, Donald M. MacKinnon, Ronald Gray Osborne, Jr., Ann Butzner, Sondra Stein, Bobby Jones, and Kristiann Herring.

DATED this 19TH day of JANUARY, 2022.

ELIAS LAW GROUP LLP

By: *Graham White*

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Exhibit H

SUPREME COURT OF NORTH CAROLINA

REBECCA HARPER, et al.,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his official
capacity as Chair of the House Standing Committee on
Redistricting, et al.,

Defendants.

NORTH CAROLINA LEAGUE OF CONSERVATION
VOTERS, INC., et al.,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his official
capacity as Chair of the House Standing Committee on
Redistricting, et al.,

Defendants.

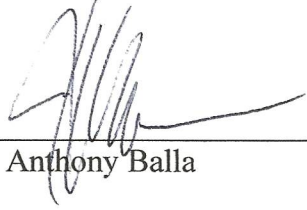
**STATEMENT IN SUPPORT
OF MOTION FOR
ADMISSION OF COUNSEL
*PRO HAC VICE***

NOW COMES John Anthony Balla and in support of the Motions for Admission of Abha Khanna, Lalitha D. Madduri, Jacob D. Shelly, Graham W. White, Elisabeth S. Theodore, R. Stanton Jones, and Samuel F. Callahan *Pro Hac Vice*, shows the Court as follows:

1. My address is 7353 Newport Ave., Raleigh, NC 27613; and

2. I have retained Abha Khanna, Lalitha D. Madduri, Jacob D. Shelly, and Graham W. White of the law firm of Elias Law Group LLP, and Elisabeth S. Theodore, R. Stanton Jones, and Samuel F. Callahan of the law firm of Arnold & Porter Kaye Scholer LLP, to represent me in the above-captioned action.

This the 20 day of January, 2022.



John Anthony Balla