

No. 413PA21

TENTH JUDICIAL DISTRICT

SUPREME COURT OF NORTH CAROLINA

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

Plaintiffs-Appellants,

v.

REPRESENTATIVE DESTIN HALL; *et al.*,

Defendants-Appellees.

From Wake County
No. 21 CVS 015426

REBECCA HARPER; *et al.*,

Plaintiffs-Appellants,

v.

REPRESENTATIVE DESTIN HALL; *et al.*,

Defendants-Appellees.

From Wake County
No. 21 CVS 500085

MOTION FOR ADMISSION OF COUNSEL PRO HAC VICE

Pursuant to N.C. Gen. Stat. § 84-4.1, Movant Caroline P. Mackie hereby moves for the admission of Ruth M. Greenwood, Theresa J. Lee, and Nicholas O. Stephanopoulos, of the Election Law Clinic at Harvard Law School

(collectively “Applicants”), to appear *pro hac vice* on behalf of Amicus, Professor Charles Fried, in the above referenced matter. In support of this motion, Caroline P. Mackie, respectfully shows the Court:

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

2. Ms. Greenwood, Ms. Lee and Prof. Stephanopoulos and the Election Law Clinic are counsel of choice for the Amicus, Charles Fried. A statement attesting to the retention of these Applicants is attached to this Motion as **Exhibit D**.

3. Pursuant to N.C. Gen. Stat. § 84-4.1(5), as local counsel in this matter and a resident of North Carolina, Ms. Mackie agrees 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 the North Carolina Supreme Court in the total amount of \$675.00 (\$225.00 per applicant) for the *pro hac* admission of Applicants.

WHEREFORE, for the reasons set forth herein, Movant respectfully requests the Court to allow this motion for admission of Ruth M. Greenwood, Theresa J. Lee, and Nicholas O. Stephanopoulos of the Election Law Clinic at Harvard Law School.

Respectfully submitted this the 21st day of January, 2022.

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CERTIFICATE OF SERVICE

I certify that, in accordance with Appellate Rule 26(c), I have served a copy of the foregoing document by e-mail to the following:

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AG Stein*

This the 21st day of January, 2022.

s/ Caroline P. Mackie
Caroline P. Mackie

Exhibit A

No. 413PA21

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Defendants-Appellees.

From Wake County

No. 21 CVS 500085

STATEMENT OF RUTH M. GREENWOOD IN SUPPORT OF MOTION
FOR ADMISSION *PRO HAC VICE*

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

1. I am an attorney and the Director of the Election Law Clinic at Harvard Law School. I work at its offices located at 6 Everett St., Suite 5112, Cambridge, MA 02138. I was admitted to the New York Bar in June of 2011 and am an active member in good standing of the New York State Bar. I was admitted to the Illinois Bar in May of 2013 and am an active member in good standing of the Illinois State Bar. I was admitted to the Massachusetts State Bar in January of 2021 and am an active member in good standing of the Massachusetts State Bar. I have also been admitted to, and am an active member in good standing of, the Bar of the United States Supreme Court. I have also been admitted to, and am an active member in good standing of, the United States Courts of Appeals for the Seventh and Eighth Circuits, and the United States District Court for the Northern District of Illinois, since 2013; and the District of Massachusetts, since 2021. I am actively engaged in the practice of law in Massachusetts.

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. The Amicus herein, Professor Charles Fried, has retained the Election Law Clinic at Harvard Law School and me to represent him in connection with the above-captioned proceeding.

4. I will continue to represent the Amicus 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 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 Caroline P. Mackie in this action. Ms. Mackie is an attorney practicing law with Poyner Spruill LLP in Raleigh, North Carolina, is duly and legally admitted to practice in the General Court of Justice of North Carolina, and is a resident of North Carolina. Service of legal proceedings and disciplinary matters may be had upon her in this action with the same effect as if personally made upon me.

Respectfully submitted, this the 21st day of January, 2022.

/s/ Ruth M. Greenwood
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Exhibit B

No. 413PA21

TENTH JUDICIAL DISTRICT

SUPREME COURT OF NORTH CAROLINA

NORTH CAROLINA LEAGUE OF
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From Wake County

No. 21 CVS 500085

**STATEMENT OF THERESA J. LEE IN SUPPORT OF MOTION FOR
ADMISSION *PRO HAC VICE***

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

1. I am an attorney and the Litigation Director of the Election Law Clinic at Harvard Law School. I work at its offices located at 6 Everett St., Suite 5112, Cambridge, MA 02138. I was admitted to the New York Bar in April of 2012 and am an active member in good standing of the New York State Bar. My admission to the Massachusetts State Bar is currently pending. I have also been admitted to, and am an active member in good standing of, the Bar of the United States Supreme Court. I have also been admitted to, and am an active member in good standing of, the United States Courts of Appeals for the Second, Fifth, and Sixth Circuits, and the United States District Court for the Southern District of New York, since 2014; and the Eastern District of New York, since 2014. I am actively engaged in the practice of law in New York and Massachusetts (under the supervision of Ruth M. Greenwood, an attorney admitted to practice in Massachusetts).

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. The Amicus herein, Professor Charles Fried, has retained the Election Law Clinic at Harvard Law School and me to represent him in connection with the above-captioned proceeding.

4. I will continue to represent the Amicus 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 Caroline P. Mackie in this action. Ms. Mackie is an attorney practicing law with Poyner Spruill LLP in Raleigh, North Carolina, is duly and legally admitted to practice in the General Court of Justice of North Carolina, and is a resident of North Carolina. Service of legal proceedings and disciplinary matters may be had upon her in this action with the same effect as if personally made upon me.

Respectfully submitted, this the 21st day of January, 2022.

/s/ Theresa J. Lee

Theresa J. Lee

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Exhibit C

No. 413PA21

TENTH JUDICIAL DISTRICT

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From Wake County

No. 21 CVS 500085

STATEMENT OF NICHOLAS O. STEPHANOPOULOS IN SUPPORT OF
MOTION FOR ADMISSION *PRO HAC VICE*

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

1. I am the Kirkland & Ellis Professor of Law at Harvard Law School and an attorney in the Election Law Clinic at Harvard Law School. I work at its offices located at 6 Everett St, Suite 5112, Cambridge MA 02138. I was admitted to the New York Bar in June of 2008 and am an active member in good standing of the New York State Bar. I was admitted to the District of Columbia Bar in March of 2009 and am an inactive 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, the Bar of the United States Supreme Court. I have also been admitted to, and am an active member in good standing of the United States District Court for the Western District of Wisconsin, since 2015. I am actively engaged in the practice of law in Massachusetts (under the supervision of Ruth M. Greenwood, an attorney admitted to practice in Massachusetts).

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. The Amicus herein, Professor Charles Fried, has retained the Election Law Clinic at Harvard Law School, and me to represent him in connection with the above-captioned proceeding.

4. I will continue to represent the Amicus 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 Caroline P. Mackie in this action. Ms. Mackie is an attorney practicing law with Poyner Spruill LLP in Raleigh, North Carolina, is duly and legally admitted to practice in the General Court of Justice of North Carolina, and is a resident of North Carolina. Service of legal proceedings and disciplinary matters may be had upon her in this action with the same effect as if personally made upon me.

Respectfully submitted, this the 21st day of January, 2022.

/s/ Prof. Nicholas O. Stephanopoulos
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Exhibit D

SUPREME COURT OF NORTH CAROLINA

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**STATEMENT OF APPLICANT, PROFESSOR CHARLES FRIED, IN SUPPORT
OF MOTION FOR ADMISSION OF COUNSEL PRO HAC VICE**

NOW COMES Professor Charles Fried and in support of the Motion for Admission of Ruth Greenwood, Theresa, Lee, and Nicholas Stephanopoulos *Pro Hac Vice*, shows the Court as follows:

1. The address of Professor Charles Fried is Harvard Law School, Areeda 333, 1585 Massachusetts Ave, Cambridge MA 02138; and
2. Professor Charles Fried has retained Ruth Greenwood, Theresa, Lee, and Nicholas Stephanopoulos of the Election Law Clinic at Harvard Law School to represent him in the above-captioned action.

This the 7th day of December, 2021.

By:



PROFESSOR CHARLES FRIED