

IN THE SUPREME COURT OF THE STATE OF KANSAS

FILED

JUL 30 2015

HEATHER L. SMITH
CLERK OF APPELLATE COURTS

HODES & NAUSER, MDs, P.A.;)
HERBERT C. HODES, M.D.; and)
TRACI LYNN NAUSER, M.D.,)

Plaintiffs-Appellees,)

v.)

DEREK SCHMIDT, in his official)
capacity as Attorney General)
of the State of Kansas; and STEPHEN M.)
HOWE, in his official capacity as District)
Attorney for Johnson County,)

Defendants-Appellants.)

Appellate Court Case # 15-114153-A
Trial Court Case # 2015-CV-490, Div. 6



MOTION FOR ADMISSION PRO HAC VICE

(Pursuant to K.S.A. Chapter 60)

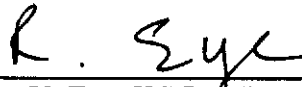
COMES NOW Bob Eye, an attorney of record in the above captioned case, and moves for the admission *pro hac vice* of Zoe Levine. I am regularly engaged in the practice of law in Kansas, in good standing with the Kansas Supreme Court, and request the admission of Zoe Levine, who is an attorney regularly engaged in the practice of law and in good standing in New York, pursuant to the rules of the highest appellate court in that jurisdiction.

I will be actively engaged in the conduct of this case; will sign all pleadings, documents, and briefs; and will be present at oral argument, if scheduled. I respectfully request the admission *pro hac vice* of Zoe Levine to practice law in the district and appellate courts of Kansas for purposes of this case only.

Please find attached the verified application of Zoe Levine and the **\$100.00** non-refundable fee.

Dated: July 30, 2015
Topeka, KS

Respectfully submitted,



Robert V. Eye, KS Bar #10689
Robert V. Eye Law Office, LLC
123 SE 6th Avenue, Suite 200
Topeka, KS 66603
(785) 234-4040
(785) 234-4260 Fax
bob@kauffmaneye.com
Attorney for Plaintiffs

future patients seeking termination of pregnancy medical services.

- B. Local counsel are Bob Eye, Kansas Bar #10689, Robert V. Eye Law Office, 123 SE 6th Avenue, Suite 200, Topeka, KS 66603, Phone (785) 234-4040, Fax (785) 234-4046, bob@kauffmaneye.com; Erin Thomson, Kansas Bar #22117, Thompson Law Firm, 106 E. 2nd Street, Wichita, KS 67202, Phone (316) 267-3933, Fax (316) 267-3901, ethompson@tslawfirm.com; and Teresa Woody, Kansas Bar #16949, The Woody Law Firm, 1621 Baltimore Ave, Kansas City, MO 64108, Phone (816) 421-4246, Fax (816) 471-4883, teresa@woodylawfirm.com.
- C. My residence address is 3428 80th Street, Jackson Heights, NY 11372. My business address is the Center for Reproductive Rights, 199 Water Street, 22nd Floor, New York, NY 10038. My business phone number is (917) 637-3639, and my business fax number is (917) 637-3666. My email address is zlevine@reprorights.org.
- D. I was admitted to the New York Bar on 4/29/2010, registration #4813705.
- E. I am a member in good standing of the above bar.
- F. I have not been the subject of prior public discipline, including but not limited to suspension or disbarment, in any jurisdiction.
- G. No disciplinary action or investigation is currently pending against me in any jurisdiction.
- H. I have not been admitted *pro hac vice* by any Kansas court in the past 12 months; however a motion and application for *pro hac* admission is currently pending in the District Court in this case, Civil Action #15-CV-490.

I swear or affirm that all of the above information is true and correct to the best of my knowledge. I understand that I remain under a continuing obligation to notify the Clerk of the Appellate Courts if a change occurs in any of the information provided.

By: Zoe Levine

Zoe Levine, NY Bar #4813705
Center for Reproductive Rights
199 Water Street, 22nd Floor
New York, NY 10038
(917) 637-3639
zlevine@reprorights.org

ATTORNEY FOR PLAINTIFFS

SUBSCRIBED AND SWORN TO before me this 28 day of July, 2015.



NOTARY PUBLIC

My Commission Expires:

March 24, 2018

TISEME G. ZEGEYE
NOTARY PUBLIC-STATE OF NEW YORK
No. 02ZE6299870
Qualified in New York County
My Commission Expires March 24, 2018

CERTIFICATE OF SERVICE

I certify that the a true and correct copy of this **VERIFIED APPLICATION** was sent by United States Mail, postage prepaid, on July 30, 2015, to:

Shon D. Qualseth
Stephen R. McAllister
Sarah E. Warner
Thompson Ramsdell Qualseth & Warner PA
333 W. 9th Street
P.O. Box 1264
Lawrence, KS 66044-2803

Jeffrey A. Chanay
Chief Deputy Attorney General
Dennis D. Depew
Deputy Attorney General, Civil Lit. Div.
Office of KS AG Derek Schmidt
Memorial Building, 3rd Floor
120 SW Tenth Avenue
Topeka, KS 66612-1597

Hodes & Nauser, MDs, PA
Herbert C. Hodes, MD
Traci Lynn Hodes Nauser, MD
4840 College Boulevard
Overland Park, KS 66211


GENEVIEVE SCOTT
ATTORNEY FOR PLAINTIFFS