

Case No. 15-0320

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**In The Supreme Court of Texas**

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**KING STREET PATRIOTS, CATHERINE ENGELBRECHT,  
BRYAN ENGELBRECHT and DIANE JOSEPHS,**

*Petitioners,*

vs.

**TEXAS DEMOCRATIC PARTY, GILBERTO A. HINOJOSA, in his capacity as  
Chairman of the Texas Democratic Party, JOHN WARREN, in his capacity  
as Democratic nominee for Dallas County Clerk, and ANN BENNETT, in her  
capacity as the Democratic Nominee for Harris County Clerk,**

*Respondents.*

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On Petition for Review from the 3rd Court of Appeals at Austin  
Case No. 03-12-00255-CV

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**UNOPPOSED MOTION TO ADMIT COUNSEL *PRO HAC VICE***

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Pursuant to TEX. R. GOVERN. BAR ADM’N. XIX, nonresident attorney Megan P. McAllen (“Applicant”) respectfully requests permission to appear in this Court *pro hac vice* on behalf of the Campaign Legal Center for purposes of filing an *amicus* brief in the above-captioned matter. As reason therefor, Applicant states:

1. Applicant practices at the following organization:

The Campaign Legal Center  
1411 K Street, NW  
Suite 1400  
Washington, DC 20005  
Tel.: (202) 736-2200

Fax: (202) 736-2222  
mmcallen@campaignlegalcenter.org

2. Applicant will be associated in this matter with Kelly G. Prather (State Bar No. 00796670), The Greenwood Prather Law Firm, 1300 McGowen Street, Houston, TX 77004, (713) 333-3200 (telephone), (713) 621-1449 (fax), kgreenwood@midtownlegal.com (email). Ms. Prather is a resident Texas practicing attorney who finds Applicant to be a reputable attorney and recommends that she be granted permission to appear in the above-captioned proceeding before this Court.

3. Applicant has not appeared or sought leave to appear in any cases in Texas courts within the past two years.

4. Applicant is an active member in good standing of the State Bar of California (CA Bar No. 281830) and the District of Columbia Bar (DC Bar No. 1020509). Applicant is also a member of the bar of the United States District Court for the District of Columbia.

5. Applicant has not been the subject of disciplinary action by the Bar or courts of any jurisdiction in which she is licensed within the preceding five years or at any time.

6. Applicant has not been denied admission to the courts of any State or to any federal court during the preceding five years or at any time.

7. Applicant is familiar with the State Bar Act, the State Bar Rules, and the Texas Disciplinary Rules of Professional Conduct governing the conduct of members of the State Bar of Texas, and will at all times abide by and comply with the same so long as this proceeding is pending and she has not withdrawn as counsel therein.

8. Applicant has paid the requisite application fee of \$250.00 and has attached proof of payment hereto.

9. Applicant has conferred with counsel to petitioners and respondents pursuant to Tex. R. App. P. 10.1, and neither petitioners nor respondents object to this motion for admission *pro hac vice*.

WHEREFORE, based on the foregoing, applicant respectfully prays this Court will allow her to appear in this matter *pro hac vice* on behalf of *amicus curiae* Campaign Legal Center.

Declared, under penalty of perjury, that the foregoing is true and correct.

Executed on November 20, 2015.

/s/ Megan P. McAllen  
Megan P. McAllen  
The Campaign Legal Center  
1411 K Street, NW  
Suite 1400  
Washington, DC 20005  
Tel.: (202) 736-2200  
Fax: (202) 736-2222  
mmcallen@campaignlegalcenter.org

### **Certificate of Service**

I certify that a true copy of the foregoing was served on all attorneys of record in accordance with the Texas Rules of Civil Procedure on this the 20<sup>th</sup> day of November, 2015.

/s/ Kelly G. Prather

### **Certificate of Conference**

Applicant has conferred with counsel to petitioners and respondents pursuant to Tex. R. App. P. 10.1, and neither petitioners nor respondents object to this motion for admission *pro hac vice*.

/s/ Megan P. McAllen

**Board of Law Examiners**  
Appointed by the Supreme Court of Texas  
P.O. Box 13486 \* Austin, Texas 78711-3486

**Acknowledgment Letter**  
**Non-Resident Attorney Fee**

November 13, 2015

To: Megan McAllen

Via: mmcallen@campaignlegalcenter.org

According to Texas Government Code §82.0361, “a nonresident attorney requesting permission to participate in proceedings in a court in this state shall pay a fee of \$250 for each case in which the attorney is requesting to participate.”

**This Acknowledgement Letter serves as proof that the Board of Law Examiners has received \$250 in connection with the following matter:**

**Non-resident attorney: Megan P. McAllen**

**Case: 15-0320**

**Texas court or body: The Supreme Court of Texas**

After satisfying the fee requirement, a non-resident attorney shall file a motion in the Texas court or body in which the non-resident attorney is requesting permission to appear. The motion shall contain the information and statements required by Rule XIX(a) of the Rules Governing Admission to the Bar of Texas. The motion must be accompanied by this Acknowledgment Letter and by a motion from a resident practicing Texas attorney that contains the statements required by Rule XIX(b).

The decision to grant or deny a non-resident attorney’s motion for permission to participate in the proceedings in a particular cause is made by the Texas court or body in which it is filed.

For more information, please see Rule XIX of the Rules Governing Admission to the Bar of Texas and §82.0361 of the Texas Government Code, which can be found on the Board’s website.

Sincerely,



Susan Henricks  
Executive Director