

Case No. 15-0320

In The Supreme Court of Texas

**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.

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

**MOTION IN SUPPORT OF J. GERALD HEBERT'S UNOPPOSED
MOTION FOR *PRO HAC VICE* ADMISSION**

Pursuant to TEX. R. GOVERN. BAR ADM'N. XIX(b), Kelly G. Prather
("Movant") files this Motion in Support of the Motion by Non-Resident Attorney
J. Gerald Hebert for Admission *Pro Hac Vice*, and states as follows:

1. J. Gerald Hebert ("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

jhebert@campaignlegalcenter.org

2. Movant is an active member in good standing of the bar of Texas. Movant's Texas State Bar Number is 00796670. Movant is a resident attorney who practices at the Greenwood Prather Law Firm, 1300 McGowen Street, Houston, TX 77004, (713) 333-3200 (telephone), (713) 621-1449 (fax), kgreenwood@midtownlegal.com (email).

3. Applicant has sought permission to appear *pro hac vice* as counsel to the Campaign Legal Center for purposes of filing an *amicus* brief in the above-captioned proceeding.

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

5. Applicant is a member in good standing of the Bar of the District of Columbia, the Commonwealth of Virginia and the Commonwealth of Pennsylvania. Applicant is also a member of the federal courts of Virginia (E.D. Va.), the District of Columbia (D.D.C), and the U.S. Courts of Appeals for the Fourth Circuit, the Fifth Circuit, the Eighth Circuit, the Tenth Circuit and the Eleventh Circuit, and the bar of the Supreme Court of the United States.

6. Movant finds Applicant to be a reputable attorney and recommends that Applicant be granted permission to appear on behalf of the Campaign Legal Center in the above-captioned proceeding before this Court.

WHEREFORE, based on the foregoing, Movant respectfully requests that this Court grant Applicant's motion to participate *pro hac vice* as counsel on behalf of the Campaign Legal Center in the above-captioned proceeding.

Signed under the pains and penalties of perjury.

Executed on November 20, 2015.

/s/ Kelly G. Prather
Kelly G. Prather,
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(TX Bar No. 00796670)
THE GREENWOOD PRATHER
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1300 McGowen Street
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Tel.: (713) 333-3200
Fax: (713) 621-1449

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of November 2015, a true and correct copy of this Motion in Support of J. Gerald Hebert's Unopposed Motion *Pro Hac Vice* has been served via e-service on counsel of record in compliance with the Texas Rules of Appellate Procedure.

/s/ Kelly G. Prather
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