

IN THE SUPREME COURT OF FLORIDA

FILED
2005 JAN 19 P 3:15
CLERK SUPREME COURT

 JOHN ELLIS "JEB" BUSH, *et al.*,)
)
 Defendants/Appellants,)
)
 CHARLES J. CRIST, JR., *et al.*,)
)
 Defendants/Appellants,)
)
 BRENDA MCSHANE, *et al.*,)
)
 Intervenors/Defendants/Appellants,)
)
 v.)
)
 RUTH D. HOLMES, *et al.*)
)
 Appellees.)

Case Nos. SC04-2323,
SC04-2324, SC04-2325

VERIFIED MOTION FOR ADMISSION PRO HAC VICE

Intervenors/Defendants/Appellants Brenda McShane, et al., respectfully move this Court pursuant to Rule 2.061(b), Rules of Judicial Administration and Rule 9.440, Florida Rules of Appellate Procedure, for leave of Clark M. Neily to appear as counsel for Intervenors/ Defendants/Appellants in the above styled action.

1. Mr. Neily is an attorney and active member in good standing of the Bar of the District of Columbia. A certificate of good standing is attached hereto. In addition, Mr. Neily is a member in good standing of the Bar of the State of Texas as well as the Bars of the United States Supreme Court, the United States

Court of Appeals for the 5th Circuit, and the United States District Court for the Northern District of Texas.

2. Mr. Neily has been granted *pro hac vice* admission before the First District Court of Appeal in the case of *Bush, et al. v. Ruth Holmes, et al.*, Case Nos. 1D01-2220/1D00-1150 (May 13, 2002) and 1D02-3160/1D02-3163/1D02-3199 (August 26, 2002). He was also admitted in the same case's lower court proceedings in *Holmes v. Bush*, Case No. 99-3370 (August 8, 2001).

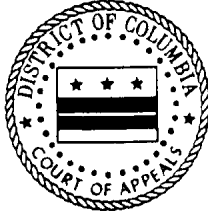
3. Mr. Neily has never been disciplined in any manner in the preceding five years, nor are there any disciplinary proceedings pending against him.

4. Representation of Intervenors/Defendants/Appellants Brenda McShane, et al. commenced on July 7, 1999.

5. The undersigned states that all applicable provisions of the Rules of Judicial Administration and the Rules Regulating the Florida Bar have been read and that this verified motion complies with such rules.

6. The name, record bar address and membership status of the Florida Bar member associated for the purposes of representation is: Kenneth W. Sukhia, Florida Bar No. 266256, 101 North Monroe Street, Suite 1090, Tallahassee, FL 32302, who is an active member in good standing of the Florida Bar.

7. Mr. Kenneth Sukhia and Mr. Clark M. Neily hereby certify that a copy of this verified motion has been served upon counsel of record in this matter.



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

CLARK M. NEILY

was on the 11TH day of JANUARY, 2002

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on January 19, 2005.

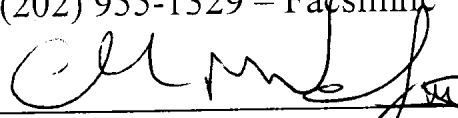
GARLAND PINKSTON, JR., CLERK

By: 
Deputy Clerk

VERIFICATION

I HEREBY VERIFY under penalty of perjury that the facts stated in the foregoing motion are true and correct.

Institute for Justice
1717 Pennsylvania Avenue, NW
Suite 200
Washington, DC 20006
(202) 955-1300
(202) 955-1329 – Facsimile



CLARK M. NEILY

Subscribed and sworn before me this
18th day of January 2005.

Notary Public, City of Washington,
District of Columbia.

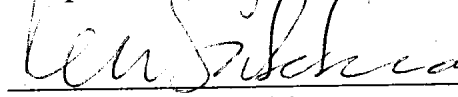


Notary Public

My Commission expires January 14, 2007.

WHEREFORE, the Court is respectfully requested to enter an Order granting *pro hac vice* status as requested above.

Respectfully submitted,



Kenneth W. Sukhia,
Fowler, White, Boggs, Banker, P.A.
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Attorney for Intervenors/Defendants/ Appellants Brenda McShane, et al.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing VERIFIED MOTION FOR ADMISSION PRO HAC VICE was dispatched this 19th day of January, 2005, via first-class mail, postage pre-paid to the following counsel of record:

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