

**IN THE SUPREME COURT OF FLORIDA**

<b>JOHN ELLIS “JEB” BUSH, <i>et al.</i>,</b>	)	
	)	
<b>Defendants/Appellants,</b>	)	
	)	
<b>CHARLES J. CRIST, JR., <i>et al.</i>,</b>	)	<b>Case Nos. SC04-2323,</b>
	)	<b>SC04-2324, SC04-2325</b>
	)	
<b>Defendants/Appellants,</b>	)	
	)	
<b>BRENDA MCSHANE, <i>et al.</i>,</b>	)	
	)	
<b>Intervenors/Defendants/Appellants,</b>	)	
	)	
<b>v.</b>	)	
	)	
<b>RUTH D. HOLMES, <i>et al.</i></b>	)	
	)	
<b>Appellees.</b>	)	
	)	

**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 William H. Mellor to appear as counsel for Intervenors/ Defendants/Appellants in the above styled action.

1. Mr. Mellor 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. Mellor is a member in good standing of the Bar of the State of Colorado as well as the Bars of the United States Supreme Court, the United States

Courts of Appeals for the Fourth, Fifth, Sixth, Ninth, Tenth and District of Columbia Circuits.

2. Mr. Mellor has not applied for admission *pro hac vice* in Florida in the preceding five years.

3. Mr. Mellor 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. William H. Mellor hereby certify that a copy of this verified motion has been served upon counsel of record in this matter.

**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  
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(202) 955-1300  
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WILLIAM H. MELLOR

Subscribed and sworn before me this \_\_\_\_\_ day of May 2005.

Notary Public, City of Washington,  
District of Columbia.

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Notary Public

My Commission expires \_\_\_\_\_.

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

Respectfully submitted,

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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 \_\_\_ day of May, 2005, via first-class mail, postage pre-paid to the following counsel of record:

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