

**IN THE SUPREME COURT OF THE STATE OF FLORIDA**

**JEB BUSH,**  
**Governor of the State of Florida,**

**Appellant,**

**CASE NO.: SC04-925**

**v.**

**MICHAEL SCHIAVO, as Guardian of**  
**the Person of THERESA MARIE SCHIAVO,**

**Appellee.**

**/**

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**MOTION TO APPEAR PRO HAC VICE IN FILING OF AMICUS**  
**CURIAE BRIEF OF THE CENTER FOR HUMAN LIFE AND**  
**BIOETHICS**

Movant, William L. Saunders, Jr., of the Center for Human Life and Bioethics at The Family Research Council, pursuant to Rule 2.061, Florida Rules of Judicial Administration, hereby moves this Court for permission to appear pro hac vice in submitting an *amicus curiae* brief in the above captioned matter. In support of this Motion, Movant states as follows:

1. William L. Saunders, Jr., is an active member in good standing in The District of Columbia Bar.
2. William L. Saunders, Jr., is not a Florida resident. William L. Saunders, Jr., is not an inactive nor a suspended member of The Florida Bar.

William L. Saunders, Jr., has not been disbarred nor received disciplinary resignation from The Florida Bar. William L. Saunders, Jr., has not previously been disciplined nor held in contempt by reason of misconduct committed while engaged in representation permitted pursuant to this rule, Rule 2.061, Florida Rules of Judicial Administration. William L. Saunders, Jr., is not engaged in a “general practice” before Florida courts.

3. William L. Saunders, Jr., has not been admitted pro hac vice and has not sought pro hac vice admission in any case or matter in Florida state courts in the preceding five years.

4. William L. Saunders, Jr., has not been disciplined in any manner in any jurisdiction in the preceding five years and does not have any disciplinary proceeding pending in any jurisdiction.

5. The legal representation at issue commenced on the \_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_, and William L. Saunders, Jr., represents the Center for Human Life and Bioethics at the Family Research Council, which seeks to file an amicus curiae brief in support of Appellant, Governor Jeb Bush.

6. All applicable provisions of these rules and the Rules Regulating The Florida Bar have been read, and this verified motion complies with those rules.

7. For purposes of the representation, Jan G. Halisky, an active member in good standing with The Florida Bar, is associated.

Mr. Jan G. Halisky  
Florida Bar # 180930  
507 South Prospect Avenue  
Clearwater, FL 33756

WHEREFORE, Movant respectfully requests that this Court grant permission for him to appear pro hac vice pursuant to Rule 2.061, Florida Rules of Judicial Administration, in filing an amicus curiae brief in this matter.

Under penalties of perjury, I declare that I have read the foregoing, and the facts alleged are true, to the best of my knowledge and belief.

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William L. Saunders, Jr.  
Director  
Center for Human Life and Bioethics at  
The Family Research Council  
801 G Street, NW  
Washington, DC 20001  
Tel. 202-624-3038  
Fax 202-393-2134  
Counsel for Movant

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Mr. Jan G. Halisky  
Florida Bar # 180930  
507 South Prospect Avenue  
Clearwater, FL 33756  
Tel. 727-461-4234  
Fax 727-442-4750  
Counsel for Movant

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Federal Express overnight delivery to **Kenneth L. Connor/Camille Godwin**, Wilkes and McHugh, P.A., One North Dale Mabry, Suite 800, Tampa, Florida 33609; to **George J. Felos**, Felos & Felos, P.A., 595 Main Street, Dunedin, Florida 34698; to **Thomas Perrelli/Robert M. Portman/ Nicole G. Berner**, Jenner & Block, LLC, 601 13<sup>th</sup> Street, NW, Suite 1200, Washington, DC; to **Randall C. Marshall**, Legal Director, American Civil Liberties Union of Florida, 4500 Biscayne Blvd., Suite 340, Miami, Florida, 33137; to **Jay Vail**, Office of the Attorney General, PL-01, The Capitol, Tallahassee, Florida 32399; and to **David Cortman**, American Center for Law and Justice, 1000 Hurricane Shoals Road, Suite D-600, Lawrenceville, GA 30043; on this \_\_\_\_\_ day of July, 2004.

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William L. Saunders, Jr.  
Director  
Center for Human Life and Bioethics at  
The Family Research Council  
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507 South Prospect Avenue  
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Tel. 727-461-4234  
Fax 727-442-4750  
Counsel for Movant