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Via In-Hand Delivery

June 15, 2026

Matthew Pollack Esq.
Clerk of the Law Court
Maine Supreme Judicial Court
205 Newbury Street, Room 139
Portland, ME 04101-4125

RECEIVED

JUN 15 2026

Clerk's Office
Maine Supreme Judicial Court

Re: Jane Gilbert, Mark Sayre, and Kaitlin v. Shenna Bellows, in her official capacity as the Secretary of State of Maine, and the State Of Maine
Supreme Judicial Court
Docket No. AP-26-10

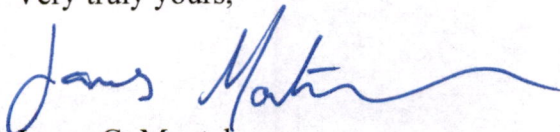
Dear Mr. Pollack:

Enclosed for filing in the above-captioned matter, please find the hard copies of the following documents that were previously e-filed this afternoon:

1. Petitioner-Appellees' Motion for Admission of Counsel Pro Hac Vice
2. A Copy of Petitioner-Appellees' Notice of Cross-Appeal filed today with the Superior Court.

Thank you for your kind assistance in this regard.

Very truly yours,



James G. Monteleone

Cc: Jonathan Bolton (via email only – jonathan.bolton@maine.gov)
Timothy Woodcock (via email only - twoodcock@katahdin-law.com)
Janna Gau (via email only – jgau@katahdin-law.com)

Enclosures

STATE OF MAINE

SUPREME JUDICIAL COURT
SITTING AS THE LAW COURT
DOCKET NO. AP-26-10

JANE GILBERT; MARK SAYRE; and
KAITLIN WEBBER,

Petitioner-Appellees

v.

SHENNA BELLOWS, in her official
capacity as the Maine Secretary of State,

Respondent-Appellee

PROTECT GIRLS SPORTS IN MAINE, a
registered Ballot Question Committee,

Intervenor-Appellant

**PETITIONER-APPELLEES'
MOTION FOR ADMISSION OF
COUNSEL *PRO HAC VICE***

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Clerk's Office
Maine Supreme Judicial Court

Petitioners Jane Gilbert, Mark Sayre, and Kaitlin Webber, through their undersigned counsel, hereby move for the admission *pro hac vice* of attorneys William (Ben) Stafford, Christopher D. Dodge, and Tyler L. Bishop, of the firm Elias Law Group LLP, to appear in this action as co-counsel for Petitioner-Appellees pursuant to M.R. App. P. 2A(b)(2)(C), M.R. Civ. P. 89(b) and 4 M.R.S. § 802.

Attorney Stafford is known to undersigned counsel as a member of the bar of the State of Washington (Bar No. 39849), in good standing, and not subject to disciplinary action by any bar.

Attorney Dodge is known to undersigned counsel as a member of the bars of the State of New York (Bar No. 5245907), the Commonwealth of Massachusetts (Bar No. 696172), and the District of Columbia (Bar No. 90011587), in good standing and not subject to disciplinary action by any bar.

Attorney Bishop is known to undersigned counsel as a member of the bars of the State of

California (Bar No. 337546), Washington (Bar No. 63821), and the District of Columbia (Bar No. 90014111), in good standing and not subject to disciplinary action by any bar.

The aforementioned applicants, as *pro hac vice* counsel, intend to be associated with undersigned counsel throughout the proceeding. Undersigned counsel shall join in signing all papers filed with this Court.

WHEREFORE, Petitioners Jane Gilbert, Mark Sayre, and Kaitlin Webber respectfully move this Court to permit William (Ben) Stafford, Esq., Christopher D. Dodge, Esq., and Tyler L. Bishop, Esq, to appear as counsel on their behalf.

Dated at Portland, Maine this 15th day of June 2026.

Respectfully submitted,



James G. Monteleone, Bar No. 5827

*Attorney for Petitioner-Appellees
Jane Gilbert, Mark Sayre and Kaitlin Webber*

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STATE OF MAINE

SUPREME JUDICIAL COURT
SITTING AS THE LAW COURT
DOCKET NO. AP-26-10

JANE GILBERT; MARK SAYRE; and
KAITLIN WEBBER,

Petitioner-Appellees

v.

SHENNA BELLOWS, in her official
capacity as the Maine Secretary of State,

Respondent-Appellee

PROTECT GIRLS SPORTS IN MAINE, a
registered Ballot Question Committee,

Intervenor-Appellant

**ORDER ON PETITIONER-
APPELLEES' MOTION FOR
ADMISSION OF COUNSEL
*PRO HAC VICE***

Upon review of Petitioner-Appellees' Motion for Admission of Counsel *Pro Hac Vice*, receipt of the required application fee, review of Respondent's response thereto, and the entire record herein, the motion is hereby GRANTED; it is further

ORDERED that William (Ben) Stafford, Esq., Christopher D. Dodge, Esq., and Tyler L. Bishop, Esq. be admitted *pro hac vice* in the above-captioned matter, and that this Order constitutes their Entries of Appearance on behalf of Petitioners Jane Gilbert, Mark Sayre, and Kaitlin Webber.

The Clerk shall incorporate this Order on the docket by reference pursuant to M.R. Civ. P. 79(a).

Dated

Justice, Supreme Judicial Court

CC COPY

STATE OF MAINE
CUMBERLAND, ss.

SUPERIOR COURT
CIVIL ACTION
DOCKET NO. PORSC-AP-26-10

JANE GILBERT; MARK SAYRE; and)
KAITLIN WEBBER,)

Petitioners,)

v.)

SHENNA BELLOWS, in her official)
capacity as Maine Secretary of State,)

Respondent,)

PROTECT GIRLS SPORTS IN MAINE, a)
registered Ballot Question Committee,)

Intervenor.)

NOTICE OF CROSS-APPEAL

Petitioners' Jane Gilbert, Mark Sayer, and Kaitlin Webber, by their undersigned counsel, and pursuant to 21-A M.R.S. § 905(3) and M.R. App. P. 2A, hereby give notice of cross-appeal as to Sections III and V of the Superior Court's Decision and Order dated April 24, 2026, and Section V of the Decision and Order dated June 11, 2026. Petitioners ultimately seek affirmance of the Superior Court's orders, as well as of the Secretary of State's Revised Determination of Validity, but file this notice of appeal to ensure preservation of the foregoing issues.

Dated at Portland, Maine, this 15th day of June, 2026.



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