

STATE OF MAINE
CUMBERLAND, ss.

SUPERIOR COURT
DOCKET NO. AP-26-10

JANE GILBERT; MARK SAYRE; and
KAITLIN WEBBER,

Petitioners,

v.

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

Respondent,

REC'D CUMB CLERKS OFC
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**PETITIONERS' MOTION
FOR ADMISSION OF COUNSEL
*PRO HAC VICE***

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, Marcos M. Mocine-McQueen, Tyler L. Bishop and Mark R. Haidar, of the firm Elias Law Group LLP, to appear in this action as co-counsel for Petitioners 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 Mocine-McQueen is known to undersigned counsel as a member of the bar of the District of Columbia (Bar No. 1779598), 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.

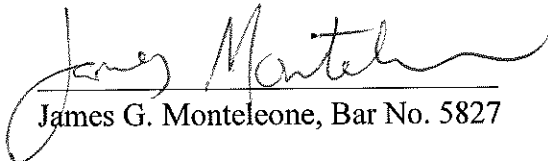
Attorney Haidar is known to undersigned counsel as a member of the bars of the District of Columbia (Bar No. 90022851) and the State of Michigan (Bar No. 87212), in good standing and not subject to disciplinary action by any bar.

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., Marcos M. Mocine-McQueen, Esq., Tyler L. Bishop, Esq. and Mark R. Haidar, Esq., to appear as counsel on their behalf.

Dated at Portland, Maine this 2nd day of April 2026.

Respectfully submitted,


James G. Monteleone, Bar No. 5827

Attorney for Petitioners Jane Gilbert, Mark Sayre and Kaitlin Webber

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NOTICE

Matters in opposition to this Motion pursuant to M.R. Civ. P. 7(c) must be filed not later than 21 days after the filing of this Motion unless another time is provided by the Maine Rules of Civil Procedure or by the Court. Failure to file timely opposition will be deemed a waiver of all objections to the Motion, which may be granted without further notice or hearing.

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Upon review of Petitioners' 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., Marcos M. Mocine-McQueen, Esq., Tyler L. Bishop, Esq. and Mark R. Haidar, 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, Superior Court