## STATE OF MAINE KENNEBEC COUNTY, ss.

SUPERIOR COURT		
Civil Action	Participant grades and and	
Docket No.	1000 6000 6000 	

DONALD J. TRUMP,

Petitioner,

ν.

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

Respondent.

EMERGENCY MOTION FOR ADMISSION OF VISITING COUNSEL PRO HAC VICE GARY LAWKOWSKI, ESQ. (M.R. Civ. P. 89(b); 4 M.R.S. § 802)

NOW COMES Petitioner Donald J. Trump, by and through counsel, and moves for the admission of visiting counsel, pursuant to Maine Rule of Civil Procedure 89(b) and 4 M.R.S. § 802, as follows:

- Petitioner Donald J. Trump presented a primary election petition to the Secretary of State for review pursuant to 21-A M.R.S. § 337.
- 2. Three challenges were filed against Mr. Trump's petition.
- 3. On December 11, 2023, the Secretary of State provided notice of a public hearing on December 15, 2023, relating to the challenges of Mr. Trump's petition.
- 4. Secretary of State Bellows permitted Gary Lawkowski to participate in the hearing pursuant to Maine Rules of Professional Conduct, Rule 5.5, cmt. 9.
- 5. On December 28, 2023, Secretary of State Bellows, as a result of the December 15, 2023 hearing, found against Petitioner, necessitating the need for Petitioner to appeal the Secretary's decision, pursuant to Maine Rules of Civil Procedure, Rule 80C.

- 6. The prior appeal was docketed in the Kennebec Superior Court as AP-24-10.
- 7. Congruent with the prior appeal, Petitioner filed an Emergency Motion for Admission of Visiting Counsel, *Pro Hac Vice*, for Gary Lawkowski, Esq.
- 8. On January 2, 2024, Justice Murphy granted Petitioner's Emergency Motion for Admission of Visiting Counsel, *Pro Hac Vice*, for Gary Lawkowski, Esq.
- 9. On January 17, 2024, after briefing by all parties, Justice Murphy remanded the matter to the Secretary "await the Supreme Court's decision in *Anderson* and to issue, within thirty days thereafter, a new Ruling modifying, withdrawing, or confirming her December 28 Ruling."
- 10. On March 4, 2024, the Supreme Court of the United States issued a decision in *Trump* v. *Anderson*.
- 11. Thereafter, on March 4, 2024, the Secretary modified her December 28, 2023, Ruling by withdrawing a small portion of her initial ruling.
- 12. It is necessary to have counsel from another jurisdiction, who participated in the underlying hearing and prior appeal, continue to participate in this process.
- 13. Undersigned counsel Bruce Hepler and Benjamin Hartwell are attorneys admitted to the Maine Bar in good standing.
- 14. Undersigned counsel is actively associated with Dhillon Law Group, Inc., in the above captioned matter. Dhillon Law Group, Inc. is at 2121 Eisenhower Avenue, Ste. 608, Alexandria, VA 22314.
- 15. Gary Lawkowski has practiced law since he became a member of the District of Columbia bar in 2022 and is currently a member in good standing of the District of Columbia bar (Bar No. 1781747). See Ex. 1.

- 16. Gary Lawkowski's *pro hac vice* admission is for the hearing in the above captioned matter pursuant to M.R. Civ. P. 80C.
- 17. Undersigned counsel moves for the admission of Gary Lawkowski as a visiting attorney to work in association with the undersigned counsel in this matter.

Respectfully submitted,

Dated: March 8, 2024

Bruce W. Hepler, Bar No. 8007 Benjamin E. Hartwell, Bar No. 6619

Attorneys for Petitioner President Donald J. Trump

Law Offices of Bruce W. Hepler 75 Pearl Street, Suite 201 Portland, Maine 04101 tele: (207) 699-0050

ben.hartwell.law@gmail.com

#### **NOTICE**

ALL MATTERS IN OPPOSITION TO THIS MOTION MUST BE FILED NOT LESS THAN 21 DAYS AFTER THE FILING OF THIS MOTION UNLESS ANOTHER TIME IS PROVIDED BY THE MAINE RULES OF CIVIL PROCEDURE OR SET BY THE COURT. FURTHER, FAILURE TO FILE A TIMELY OPPOSITION WILL BE DEEMED A WAIVER OF ALL OBJECTIONS TO THIS MOTION, AND THIS MOTION MAY THEN BE GRANTED WITHOUT FURTHER NOTICE OR HEARING.



On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, the District of Columbia Bar does hereby certify that

### Gary Michael Lawkowski

was duly qualified and admitted on March 29, 2022 as an attorney and counselor 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 December 14, 2023.

JULIO A. CASTILLO
Clerk of the Court

Issued By:

David Chu - Director, Membership District of Columbia Bar Membership

For questions or concerns, please contact the D.C. Bar Membership Office at 202-626-3475 or email memberservices@dcbar.org.

STATE OF MAINE KENNEBEC COUNTY, ss.	SUPERIOR COURT Civil Action Docket No.
DONALD J. TRUMP,  Petitioner,	ORDER ON EMERGENCY MOTION FOR
SHENNA BELLOWS, in her official capacity as Secretary of State, State of Maine,	ADMISSION OF VISITING COUNSEL PRO HAC VICE GARY LAWKOWSKI, ESQ (M.R. Civ. P. 89(b); 4 M.R.S. § 802)
Respondent.	
After consideration of Petitioner's <b>EMEF VISITING COUNSEL</b> , <i>PRO HAC VICE</i> , the covisiting attorney to work in association with Bruce Esq. in this matter. The Motion is hereby GRAN'	ce W. Hepler, Esq. and Benjamin E. Hartwell,
Dated: Justi	ce, Maine Superior Court

## STATE OF MAINE KENNEBEC COUNTY, ss.

SUPERIOR COURT	
Civil Action	
Docket No.	

DONALD J. TRUMP,

Petitioner,

ν.

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

Respondent.

AUGUSTA COURTS MAR 8 '24 PKB: 36

EMERGENCY MOTION FOR ADMISSION OF VISITING COUNSEL PRO HAC VICE SCOTT GESSLER, ESQ. (M.R. Civ. P. 89(b); 4 M.R.S. § 802)

NOW COMES Petitioner Donald J. Trump, by and through counsel, and moves for the admission of visiting counsel, pursuant to Maine Rule of Civil Procedure 89(b) and 4 M.R.S. § 802, as follows:

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   2023, hearing, found against Petitioner, necessitating the need for Petitioner to appeal
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- 9. On January 17, 2024, after briefing by all parties, Justice Murphy remanded the matter to the Secretary "await the Supreme Court's decision in *Anderson* and to issue, within thirty days thereafter, a new Ruling modifying, withdrawing, or confirming her December 28 Ruling."
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- 11. Thereafter, on March 4, 2024, the Secretary modified her December 28, 2023, Ruling by withdrawing a small portion of her initial ruling.
- 12. It is necessary to have counsel from another jurisdiction, who participated in the underlying hearing and prior appeal, continue to participate in this process.
- 13. Undersigned counsel Bruce Hepler and Benjamin Hartwell are attorneys admitted to the Maine Bar in good standing.
- 14. Undersigned counsel is actively associated with Scott Gesler, Esq. of Gessler Blue, LLC, in the above captioned matter. Gessler Blue, LLC is at 7350 E. Progress Place, Ste. 100, Greenwood Village, CO.
- 15. Scott Gesler, Esq. has practiced law since he became a member of the Illinois bar in1990 and is currently a member in good standing of the Colorado bar (Bar No.28944). See Ex. 1. Scott Gesler, Esq. is an inactive member of the Illinois bar and

Washington DC bar. See Exhibit 1, 2.

- 16. Scott Gesler, Esq.'s *pro hac vice* admission is for the hearing in the above captioned matter pursuant to M.R. Civ. P. 80C.
- 17. Undersigned counsel moves for the admission of Scott Gesler, Esq. as a visiting attorney to work in association with the undersigned counsel in this matter.

Respectfully submitted,

Dated: March 8, 2024.

Bruce W. Hepler, Bar No. 8007 Benjamin E. Hartwell, Bar No. 6619 Attorneys for Petitioner President Donald J. Trump

Law Offices of Bruce W. Hepler 75 Pearl Street, Suite 201 Portland, Maine 04101 tele: (207) 699-0050 ben.hartwell.law@gmail.com

#### NOTICE

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AUGUSTA COURTS MAR 8 '24 PH3: 36



## State of Colorado,

STATE OF COLORADO, ss:	
I, <u>Cheryl Stevens</u> , Clerk of the Supreme Court of the	State
of Colorado, do hereby certify that	
SCOTT ERIC GESSLER	

has been duly licensed and admitted to practice as an

### ATTORNEY AND COUNSELOR AT LAW

within this State; and that his/her name appears upon the Roll of



IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed the Seal of said Supreme Court, at Denver, in said State, this

30 <sup>th</sup>	day of	November	A.D <b>2</b>	023	
		Cheryl Stevens			
	/			Clerk	
<b>17.</b>	(_	Mistrall the			

Deputy Clerk



On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, the District of Columbia Bar does hereby certify that

### Scott E Gessler

was duly qualified and admitted on December 7, 1992 as an attorney and counselor entitled to practice before this Court; and is, on the date indicated below, an Inactive 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 December 14, 2023.

JULIO A. CASTILLO
Clerk of the Court

Issued By:

David Chu - Director, Membership District of Columbia Bar Membership

For questions or concerns, please contact the D.C. Bar Membership Office at 202-626-3475 or email memberservices@dcbar.org.



# ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION of the SUPREME COURT OF ILLINOIS

EXHIBIT

One Prudential Plaza 130 East Randolph Drive, Suite 1500 Chicago, Illinois 60601-6219 (312) 565-2600 (800) 826-8625 Fax (312) 565-2320 3161 West White Oaks Drive, Suite 301 Springfield, IL 62704 (217) 546-3523 (800) 252-8048 Fax (217) 546-3785

Scott Eric Gessler 7350 East Progress Place Suite 100 Greenwood Village, CO 80111

> Chicago Thursday, December 14, 2023

In re: Scott Eric Gessler Attorney No. 6204417

To Whom It May Concern:

The records of the Clerk of the Supreme Court of Illinois and of this office indicate that the attorney named above was admitted to the practice of law in Illinois on 11/19/1990; has never been disciplined; and is registered as inactive for 2023.

Very truly yours, Lea S. Gutierrez Administrator

By:\_//s//:**Lisa Medina**Lisa Medina
Deputy Registrar

LM

STATE OF MAINE KENNEBEC COUNTY, ss.	SUPERIOR COURT Civil Action Docket No
DONALD J. TRUMP,	
Petitioner, v.  SHENNA BELLOWS, in her official capacity as Secretary of State, State of Maine,	ORDER ON EMERGENCY MOTION FOR ADMISSION OF VISITING COUNSEL PRO HAC VICE SCOTT GESSLER, ESQ (M.R. Civ. P. 89(b); 4 M.R.S. § 802)
Respondent.	
VISITING COUNSEL, PRO HAC VICE, th	MERGENCY MOTION FOR ADMISSION OF the court hereby admits Scott Gesler, Esq. as a Bruce W. Hepler, Esq. and Benjamin E. Hartwell, ANTED.

Justice, Maine Superior Court

Dated: