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*Attorneys for the Carter, et al.
Petitioners in 7 MM 2022*

IN THE SUPREME COURT OF PENNSYLVANIA

CAROL ANN CARTER, *et al.*,
Petitioners,
v.
LEIGH M. CHAPMAN, *et al.*,
Respondents.

No. 7 MM 2022

**MOTION OF MICHAEL MCDONALD FOR
ADMISSION PRO HAC VICE OF MATTHEW GORDON**

Michael McDonald, Esquire, hereby moves that Matthew Gordon, Esquire be admitted to appear and practice in this Court as counsel *pro hac vice* for the Carter, *et al.* Petitioners in 7 MM 2022 pursuant to Pennsylvania Bar Admission Rule 301 and Pa. R.C.P. No. 1012.1, and in support of this Motion, states as follows:

1. The information required by Section 81.504 of the IOLTA regulations has been provided to the IOLTA Board.
2. The fee required by Section 81.505(a) of the IOLTA regulations has been paid.

3. As required by Pennsylvania Rule of Civil Procedure 1012.1(c) and (d)(2), the Verification of Matthew Gordon in Support of *Pro Hac Vice* Admission is attached hereto as Exhibit A, and the Verification of Michael McDonald in Support of *Pro Hac Vice* Admission is attached hereto as Exhibit B.

WHEREFORE, I respectfully request that the Court grant this motion to admit Matthew Gordon *pro hac vice* to appear in this matter.

Dated: February 1, 2022

Respectfully submitted,

/s/ Michael McDonald
Michael McDonald
BALLARD SPAHR LLP

Attorney for Carter, et al.
Petitioners in 7 MM 2022

EXHIBIT A to Motion

BALLARD SPAHR, LLP
BY: Michael R. McDonald PA ID., No. 326873
1735 Market Street, 51st Floor
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Counsel for Petitioners

IN THE SUPREME COURT OF PENNSYLVANIA

CAROL ANN CARTER; MONICA
PARRILLA; REBECCA POYOUROW;
WILLIAM TUNG; ROSEANNE
MILAZZO; BURT SIEGEL; SUSAN
CASSANELLI; LEE CASSANELLI;
LYNN WACHMAN; MICHAEL
GUTTMAN; MAYA FONKEU; BRADY
HILL; MARY ELLEN BALCHUNIS;
TOM DEWALL; STEPHANIE
MCNULTY; and JANET TEMIN,

Petitioners,

v.

LEIGH M. CHAPMAN, in her official
capacity as the Acting Secretary of the
Commonwealth of Pennsylvania; JESSICA
MATHIS, in her official capacity as
Director for the Pennsylvania Bureau of
Election Services and Notaries,
Respondents.

SUPREME COURT OF
PENNSYLVANIA

No. 7 MM 2022

**VERIFICATION OF MATTHEW GORDON IN SUPPORT OF
PRO HAC VICE ADMISSION**

I, MATTHEW GORDON, hereby certify that:

1. I am a partner in the law firm of Perkins Coie, LLP, 1201 Third Ave, Suite

4900, Seattle, WA 98101-3099. My telephone number is (206) 359-3552 and my email address is MGordon@perkinscoie.com.

2. I am admitted to practice, and a member in good standing, of the Bar of the following courts:

Jurisdiction	Date Admitted	Bar. No.
Washington State Bar	02/05/2009	41128
Idaho	09/30/2010	8554
United States District Court for the District of Idaho	09/30/2010	N/A
United States District Court for the Western District of Washington	02/19/2013	N/A
United States Court of Appeals, 9th Circuit	04/25/2013	N/A
Montana	02/12/2019	53468386
United States Court for the Western District of New York	08/22/2019	N/A
United States Court for the District of Montana	08/12/2020	N/A
United States Court for the District of Colorado	10/13/2020	N/A
United States Supreme Court	09/10/2021	N/A

3. I never have been suspended, disbarred, or otherwise disciplined in any jurisdiction in which I am admitted to practice. There are no disciplinary proceedings pending against me as a member of the Bar in any jurisdiction.
4. I applied for and was admitted *pro hac vice* in the Commonwealth Court of Pennsylvania for case number 464 MD 2021. I also applied for admission *pro hac vice* in the Supreme Court of Pennsylvania for case number 141 MM 2021, which action was initiated by an Application for Extraordinary Relief. The Court never ruled on my filed *pro hac vice* application in no. 141 MM 2021, however, because the Court subsequently denied the Application for Extraordinary Relief. I have not applied for admission *pro hac vice* in any other pending case in a court of record of the Commonwealth of Pennsylvania, nor have I been denied such admission.
5. I shall comply with and be bound by the applicable statutes, case law, and procedural rules of the Supreme Court of Pennsylvania, including the Pennsylvania Rules of Professional Conduct.
6. I shall submit to the jurisdiction of the Pennsylvania Courts and the Pennsylvania Disciplinary Board with respect to acts or omissions occurring during my appearance in the above captioned matter.
7. I consent to the appointment of Michael R. McDonald, as my sponsor, as the agent upon whom service of process shall be made for all actions, including

disciplinary actions, that may arise out of the practice of law in the above-captioned matter.

8. On January 31, 2022, pursuant to Pennsylvania Rule of Civil Procedure 1012.1(b)(1) and Section 81.504 of the IOLTA regulations, I submitted an application to the IOLTA Board in support of my *pro hac vice* admission.
9. Also on January 31, 2022, I received a letter from Stephanie S. Libhart, Executive Director of the IOLTA Board, certifying that the fee required by Section 81.505(a) of the IOLTA regulations had been paid. A true and correct copy of the letter is attached to this Verification as Exhibit 1.
10. The foregoing is true and correct to the best of my knowledge, information, and belief and is subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

January 31, 2022


Matthew Gordon, Esq.

Exhibit 1



SUPREME COURT OF PENNSYLVANIA
PENNSYLVANIA INTEREST ON
LAWYERS TRUST ACCOUNT BOARD

January 31, 2022

MATTHEW GORDON, Esq.
PERKINS COIE LLP
1201 THIRD AVENUE, SUITE 4900
SEATTLE, WA 98101

SENT TO MATTHEW GORDON VIA Email: MGORDON@PERKINSCOIE.COM

Dear Attorney GORDON:

This letter serves as the fee payment certification referenced in 204 Pa Code §81.503 and acknowledges receipt of the \$375.00 fee paid by Online Payment on this date related to your pursuit for admission *pro hac vice* in the case identified as CARTER ET AL. V. CHAPMAN ET AL., no. 7 MM 2022, filed in the Supreme Court of Pennsylvania.

You should refer to Pa Rule of Civil Procedure 1012.1, local court rules, and other regulations of 204 Pa Code §81.501 et. seq. concerning additional requirements related to seeking *pro hac vice* admission.

Sincerely,

A handwritten signature in blue ink that reads "Stephanie S. Libhart".

Stephanie S. Libhart
Executive Director

cc: MICHAEL R. MCDONALD, Esq.
McDonaldM@Ballardspahr.com

Pennsylvania Judicial Center
601 Commonwealth Ave., Ste. 2400
PO Box 62445, Harrisburg, PA 17106-2445
717/238-2001 · 888/PA-IOLTA (724-6582) · 717/238-2003 FAX
paiolta@pacourts.us · www.paiolta.org

Administering Pennsylvania's Interest On Lawyers Trust Account (IOLTA) Program

EXHIBIT B to Motion

BALLARD SPAHR, LLP

Attorneys for Carter, et al.

BY: Michael McDonald, No. 326873

Petitioners in 7 MM 2022

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Respondents.

No. 7 MM 2022

**VERIFICATION OF MICHAEL MCDONALD IN SUPPORT OF
MATTHEW GORDON'S *PRO HAC VICE* ADMISSION**

I, MICHAEL MCDONALD, hereby certify that:

1. I am an associate in the law firm of Ballard Spahr LLP, 1735 Market Street, 51st Floor, Philadelphia, PA 19103-7599. My telephone number is (215) 864-8425 and my e-mail address is mcdonaldm@ballardspahr.com.
2. After reasonable investigation, I reasonably believe that Matthew Gordon, Esquire is a reputable and competent attorney, and I am in a position to recommend this candidate for *pro hac vice* admission in the above captioned matter.
3. I am currently acting as a sponsor of candidates for admission *pro hac vice* in *Carter, et al. v. Chapman, et al.*, No. 464 MD 2021 (Commw. Ct.), and this action.

I also previously acted as a sponsor of Mr. Gordon in *Carter, et al. v. Degraffenreid, et al.*, No. 141 MM 2021 (Pa.), however, the Court never ruled on that admission because the Court denied the underlying Application for Extraordinary Relief.¹

4. I agree that the proceeds from any settlement related to this cause of action in which Matthew Gordon, Esquire is granted admission *pro hac vice* shall be received, held, distributed and accounted for in accordance with Rule 1.15 of the Pennsylvania Rules of Professional Conduct, including IOLTA provisions thereof.

5. The foregoing is true and correct to the best of my knowledge, information, and belief and is subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

February 1, 2022

A handwritten signature in black ink, appearing to read 'M. McDonald', written over a horizontal line.

Michael McDonald, Esq.

¹ To the extent that Case No. 141 MM 2021 is reactivated and consolidated with this action as requested by the *Gressman* Petitioners in their January 31, 2022 Request for Clarification, I respectfully request that this Court also grant my Motion for Admission *Pro Hac Vice* of Matthew Gordon filed in 141 MM 2021 on January 7, 2022.

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CAROL ANN CARTER, *et al.*,
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No. 7 MM 2022

ORDER

AND NOW, this ____ day of _____, 2022, it is hereby ORDERED that the motion of Michael McDonald, counsel for the Carter, *et al.* Petitioners in 7 MM 2022, for the admission *pro hac vice* of Matthew Gordon to practice before this Court representing the Carter, *et al.* Petitioners, is GRANTED, and Mr. Gordon is hereby specially admitted to the Bar of this Court for purposes limited to the above-captioned action.

, J.