Filed 11/9/2022 1:40:00 AM Commonwealth Court of Pennsylvania 277 MD 2021

IN THE COMMONWEALTH OF PENNSYLVANIA

COUNTY OF FULTON, et al.,

Petitioners/Appellees,

v.

SECRETARY OF THE COMMONWEALTH,

No. 277 MD 2021

No. 3 MAP 2022

Respondent/Appellant

MOTION TO APPEAR PRO HAC VICE, CONSENT TO DESIGNATION, AND REQUEST TO ELECTRONICALY RECEIVE NOTICES OF ELECTRONIC FILING

In accordance with P.R.C.P. 1012.1, governing *pro hac vice* admission, the undersigned respectfully moves for the admission *pro hac vice* of Stefanie Lambert Junttila of the Law Office of Stefanie L. Lambert PLLC, 500 Griswold Street, Suite 2340, Detroit, MI 48266, (313) 410-6872, for the purposes of appearance as cocounsel on behalf of Petitioners/Appellees, Fulton County, in the above-styled case only, and to permit Stefanie Lambert Junttila to receive electronic filings in this case, and in support thereof states as follows:

Stefanie Lambert Junttila is not admitted to practice in the State of
Pennsylvania and is a member in good standing of The Michigan State
Bar. See Affidavit of Stefanie Lambert Junttila and certificate from
the State Bar of Michigan. Attached hereto as Exhibit A and Exhibit
B.

- 2. Movant, Thomas J Carroll, Esquire, of the Law Office of Thomas J Carroll, is a member in good standing of the Pennsylvania State Bar and is authorized to file through the Court's electronic filing system. Movant consents to be designated as a member of the Bar of this Court with whom the Court and Stefanie Lambert Junttila, may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file and serve all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving documents in compliance with the Pennsylvania Rules of Civil Procedure and Pennsylvania Court Rules.
- 3. Movant, Thomas J. Carroll, Esq., attests that he has read the Affidavit of Stefanie Lambert Junttila, has made a responsible inquiry concerning its contents, believes Stefanie Lambert Junttila representations are true, and agrees to ensure that all applicable rules of procedure and the Court are followed. Attached hereto as Exhibit C.
- 4. In accordance with P.R.C.P. 1012.1 of the Rules Governing pro hac vice admission, Stefanie Lambert Junttila has made the applicable \$375.00 admission fee. Attached hereto as Exhibit D.
- Stefanie Lambert Junttila by and through P.R.C.P. 1012.1 of the Rules Governing pro hac vice admission, hereby requests the Court to

provide Notice of Electronic Filings to Stefanie Lambert Junttila, Esq. at the following email address: AttorneyLambert@protonmail.com.

WHEREFORE, Movant, Thomas J. Carroll moves this Court to enter an Order granting Stefanie Lambert Junttila to appear before this Court as cocounsel, on behalf of the Petitioners/Appellees, Fulton County, for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Stefanie Lambert Junttila.

Respectfully submitted,

Dated: November 8, 2022 By: /s/ Thomas J. Carroll

LAW OFFICE OF THOMAS J CARROLL

Attorney for Plaintiffs Attorney ID: 53296 Thomas J. Carroll 224 King Street Pottstown, PA, 19464

tom@thomasjcarrolllaw.com

(610)419-6981

3

AFFIDAVIT OF STEFANIE LAMBERT JUNTTILA

BEFORE ME, the undersigned authority duly qualified to take statements and acknowledgement under oath, personally appeared STEFANIE LAMBERT who, being by me first duly sworn, deposes and states as follows:

- 1. My name is Stefanie Lambert Junttila, I am over the age of eighteen (18) and I have personal knowledge of the facts stated herein.
- 2. I am an attorney duly admitted to the practice of law in the State of Michigan.
- 3. I have been practicing law in the State of Michigan for over fifteen (15) years and my Michigan Bar Number is P 71303.
- 4. I am admitted to the United States District for the Eastern District of Michigan and the United States District Court for the Western District of Michigan as well as numerous federal and state courts by admission or pro hac vice admission.
- 5. I have never been disbarred, or suspended in any jurisdiction, and I am in good standing in all jurisdictions where licensed. I have never had a disciplinary matter prior to King v. Whitmer, Case No. 20-13134. I filed my appearance as Michigan appellate counsel after the case was dismissed by Judge Parker. I was sanctioned by Judge Linda Parker, and I have filed an appeal which is currently pending in the sixth circuit court of appeals, Case No. 22-1010.

6. I have never applied for admission pro hac vice in Pennsylvania.

7. I consent to the jurisdiction of Pennsylvania courts and the

Pennsylvania Disciplinary Board with respect to acts and

omissions occurring during my appearance in Moton v. Boockvar

et al.

8. I shall comply with, and be bound by, the applicable statutes, case

law and procedural rules of the Commonwealth of Pennsylvania,

including the Pennsylvania Rules of Professional Conduct.

9. I have consented to the appointment of Thomas J. Carroll, Esquire, 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 County of Fulton, et al. v. Secretary of the Commonwealth.

Dated: November 8, 2022

By: /s/ Stefanie Lambert Junttila P71303

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5

ATTESTATION OF THOMAS J. CARROLL, ESQ. REGARDING THE PRO HAC VICE ADMISSION OF STEFANIE LAMBERT JUNTTILA

BEFORE ME, the undersigned authority duly qualified to take statements and acknowledgement under oath, personally appeared THOMAS J. CARROLL, who, being by me first duly sworn, deposes and states as follows:

- My name is Thomas J. Carroll, I am an attorney duly admitted to the practice of law in the State of Pennsylvania.
- 2. I have read the Affidavit of Stefanie Lambert Junttila in support of her Pro Hac Vice admission to the State Bar of Pennsylvania (the "Affidavit") and believes same to be true and accurate.
- 3. After reasonable investigation, I believe Stefanie Lambert Junttila to be a reputable and competent attorney and can recommend her admission pro hac vice.
- 4. I have never acted as a sponsor for admission pro hac vice.
- 5. Any proceeds from any settlement in this matter, should any exist, will be received, held, distributed, and accounted for in accordance with Pennsylvania Rules of Professional Conduct 1.15, including the provisions of IOLTA, if applicable.

LAW OFFICE OF THOMAS J CARROLL

Attorney for Plaintiffs
Attorney ID: 53296
Thomas J. Carroll
224 King Street
Pottstown, PA, 19464
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