

IN THE SUPREME COURT OF THE STATE OF KANSAS

HODES & NAUSER, MDs, P.A., et al., )

*Appellee,* )

v. )

No. 114,153

DEREK SCHMIDT, in his official capacity )  
as Attorney General of the State of Kansas, )  
et al., )

*Appellant.* )

**MOTION FOR ADMISSION OF DAVID H. GANS PRO HAC VICE**

(Pursuant to K.S.A. Chapter 60)

COMES NOW Stephen D. Bonney, an attorney of record in the above captioned case, and moves for the admission *pro hac vice* of David H. Gans. I am regularly engaged in the practice of law in Kansas, in good standing with the Kansas Supreme Court, and request the admission of David H. Gans, who is an attorney regularly engaged in the practice of law and in good standing in the District of Columbia, pursuant to the rules of the highest appellate court in that jurisdiction. I will be actively engaged in the conduct of this case and will sign all briefs. I respectfully request the admission *pro hac vice* of David H. Gans to practice law in the Supreme Court of Kansas for purposes of this case only. Please find attached the verified application of David H. Gans and the **\$100.00** nonrefundable fee.

Respectfully submitted,

/s/ Stephen Douglas Bonney  
Stephen Douglas Bonney, KS Bar No. 12322  
ACLU OF KANSAS  
6701 W 64th St., Suite 210  
Overland Park, KS 66202  
(913) 490-4100  
dbonney@aclukansas.org  
*Counsel of Record for Amicus ACLU of Kansas*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the above and foregoing **MOTION FOR ADMISSION OF DAVID H. GANS *PRO HAC VICE* and VERIFIED APPLICATION FOR ADMISSION *PRO HAVE VICE*** was filed with the Clerk of the Court and served on all parties below by email through the Court's electronic filing system on June 23, 2016.

/s/ Stephen Douglas Bonney  
Stephen Douglas Bonney  
Counsel for *Amicus* ACLU of Kansas

IN THE SUPREME COURT OF THE STATE OF KANSAS

HODES & NAUSER, MDs, P.A.; )  
HERBERT C. HODES, M.D.; and )  
TRACI LYNN NAUSER, M.D., )

Plaintiffs-Appellees, )

v. )

DEREK SCHMIDT, in his official )  
capacity as Attorney General of )  
the State of Kansas; and )  
STEPHEN M. HOWE, in his )  
official capacity as District )  
Attorney for Johnson County, )

Defendants-Appellants. )

Appellate Court Case  
No. 15-114153-A  
Trial Court Case  
No. 2015-CV-490, Div. 6

**VERIFIED APPLICATION FOR ADMISSION PRO HAC VICE**

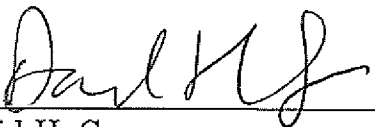
(Pursuant to K.S.A. Chapter 60)

COMES NOW David H. Gans and applies for admission *pro hac vice* for purposes of the above-captioned case, and in support of this application states the following:

1. I, along with local counsel, represent the Constitutional Accountability Center and the ACLU of Kansas respectively as *amici curiae* in support of plaintiffs-appellees.
2. Local counsel is Stephen D. Bonney, Kansas Bar No. 12322, ACLU of Kansas, 6701 W 64th St., Suite 210, Overland Park, KS 66202, Phone (913) 490-4100, dbonney@aclukansas.org.

3. My office is located at the Constitutional Accountability Center, 1200 18th St. NW, Suite 501, Washington, D.C. 20036, Phone (202)-296-6889, david@theusconstitution.org.
4. I was admitted to the D.C. Bar on January 8, 1999, registration No. 461002, and the New York Bar in June 1997, registration No. 2829141.
5. I am a member in good standing of the above bars.
6. I have not been the subject of prior public discipline, including but not limited to suspension or disbarment, in any jurisdiction.
7. No disciplinary action or investigation is currently pending against me in any jurisdiction.
8. I have not been admitted *pro hac vice* by any Kansas court in the past 12 months.

I, the undersigned, swear or affirm that all of the above information is true and correct to the best of my knowledge. I understand that I remain under a continuing obligation to notify the Clerk of the Kansas Supreme Court if a change occurs in any of the information provided.

By:   
David H. Gans  
DC Bar No. 461002, NY Bar No. 2829141  
CONSTITUTIONAL ACCOUNTABILITY  
CENTER  
1200 18th St. NW  
Washington, D.C. 20036  
(202)-296-6889  
*Attorney for Amicus Constitutional  
Accountability Center*

SUBSCRIBED AND SWORN TO before me this 21st day of June, 2016

*Ed M. ...*  
NOTARY PUBLIC

My Commission Expires:

~~My Commission Expires~~  
January 14, 2021

