

DISTRICT COURT, CITY AND COUNTY OF DENVER, STATE OF COLORADO 1427 Bannock Street, Room 256 Denver, Colorado 80202	▲ COURT USE ONLY ▲
Plaintiff(s): Anderson, et al. Defendant(s): Griswold, et al.	
Applicant Attorney: Jay Alan Sekulow Address: 201 Maryland Avenue, NE Washington, DC, 20002 Phone Number: (202) 546-8890 Fax Number: (202) 546-9309 Email: sekulow@aclj.org Atty. Reg. #: DC Bar No. 496335 Sponsoring Attorney: Michael Melito Address: MELITO LAW, LLC 1875 Lawrence St., Ste. 730 Denver, Colorado 80202 Phone Number: (303) 813-1200 Fax Number: Email: Melito@melitolaw.com Atty. Reg. #: CO Bar No. 36059	Case No: 23CV32577 Division: 209
OUT OF STATE COUNSEL'S VERIFIED MOTION REQUESTING PRO HAC VICE ADMISSION	

Pursuant to C.R.C.P. 121 § 1-2, and Rule 205.3, *Jay Alan Sekulow* of the Law Firm of *the American Center for Law and Justice, of Washington, D.C.*, moves for pro hac vice admission to practice before this Court in the above-captioned matter.

AS GROUNDS FOR THIS MOTION, *Jay Alan Sekulow* states and shows the Court the following:

1. Under Rule 205.3, an attorney and counselor at law in good standing from any other jurisdiction in the United States may, in the discretion of a Colorado court of record, be permitted to participate before the Court in a trial, argument and other proceeding in the particular case in which the attorney is employed, provided that a member in good standing of the Bar of the State of Colorado is associated in such cause at all stages of the case.
2. *Jay Alan Sekulow*, of the Law Firm of *the American Center for Law and Justice*, is a member in good standing of the Bar in the State of

Washington, D.C. *Jay Alan Sekulow* is assigned attorney registration or bar admission number 496335 in Washington, D.C.

3. *Jay Alan Sekulow* has also been licensed in the following jurisdiction: Georgia, under the following admission number 634900.
4. *Jay Alan Sekulow* is in good standing in all Bars wherever admitted and has not been subject to any order of discipline or disability by any Bar, or had any request for pro hac vice admission denied or revoked.

or

~~_____ [Name of Applicant Attorney] has been publicly disciplined, placed under an order of disability, or has had a request for pro hac vice admission denied or revoked in the following jurisdictions:~~

~~_____ (state the jurisdiction, the date of transfer to disability, the date of discipline, the date of the denial or revocation, or pro hac vice admission, the nature of the violation and the discipline imposed or the reason for the denial or revocation of pro hac vice admission).~~

5. *Jay Alan Sekulow* has not previously sought pro hac vice admission in Colorado.

or

~~_____ [Name of Applicant Attorney] has been admitted pro hac vice in the following Colorado cases in the preceding five years: _____~~

~~(state the date, case name, and case number all other matters in Colorado in which pro hac vice admission has been sought and whether admission was granted or denied).~~

6. *Jay Alan Sekulow* acknowledges that he is subject to all applicable provisions of the Colorado Rules of Professional Conduct, the Colorado Rules of Civil Procedure and other court rules, and that he has read such rules and will follow such rules.
7. *Michael Melito*, CO Bar No. 36059, is a member in good standing of the Bar of the State of Colorado.
8. *Michael Melito* will be present and participate in a meaningful and substantial manner throughout the proceedings and trial of this matter.

9. The following are parties to the proceeding and have been notified of this Verified Motion requesting pro hac vice admission:

Attorneys for Petitioners

Eric R. Olson
Sean C. Grimsley
Jason C. Murray
Olson Grimsley Kawanabe Hincheliff & Murray LLC
700 17th Street, Suite 1600
Denver, CO 80202
303-535-9151
eolson@olsongrimsley.com
sgrimsley@olsongrimsley.com
jnmurray@olsongrimsley.com

Jonathan E. Maier
Nikhel Suresh Sus
Citizens for Responsibility and Ethics in Washington
1331 F Street NW, Suite 900
Washington, DC 20004
202-408-5565
jmaier@citizensforethics.org
nsus@citizensforethics.org

Mario Daniel Nicolais, II
KBN Law LLC
7830 West Alameda Avenue, Suite 103-301
Lakewood, CO 80226
720-773-1526
mario@kbnlaw.com

Martha M. Tierney
Tierney Lawrence Stiles LLC
225 East 16th Avenue, Suite 350
Denver, CO 80203
303-356-4870
mtierney@tierneylawrence.com

Attorneys for Respondent Donald Trump

Geoffrey N. Blue

Scott E. Gessler

Justin T North

Gessler Blue, LLC

7350 E. Progress Place, Suite 100

Greenwood Village, CO 80111

720-647-5320

626-353-2614

gblue@gesslerblue.com

sgessler@gesslerblue.com

jnorth@gesslerblue.com

Attorneys for Respondent Colorado Secretary of State

MICHAEL T. KOTLARCZYK

Senior Assistant Attorney General

Public Officials Unit | State Services Section

Ralph L. Carr Colorado Judicial Center 1300 Broadway, 6th Floor

Denver, CO 80203

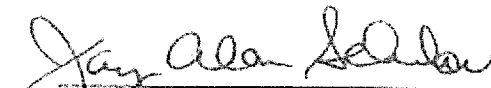
Telephone: 720.508.6187

mike.kotlareczyk@coag.gov

10. *Jay Alan Sekulow* has filed a copy of this motion with the Clerk of the Colorado Supreme Court at the Office of Attorney Registration, 1300 Broadway, Suite 510, Denver, Colorado 80203 and paid the required fee.
11. An affidavit setting forth *Jay Alan Sekulow's* qualifications and compliance is attached.
12. By execution of the attached verification, the Colorado licensed Sponsoring Attorney verifies his association on this matter.

WHEREFORE, Out of State Counsel respectfully requests that the Court admit *Jay Alan Sekulow* pro hac vice, to practice before the Court in this case.

Respectfully submitted on the 14th day of September, 2023.



Jay Alan Sekulow

DC Bar No. 496335

201 Maryland Avenue, NE

Washington, D.C. 20002

(202) 546-8890

and



MICHAEL MELITO
(CO Bar No. 36059)
MELITO LAW, LLC
1875 Lawrence St., Ste. 730

Denver, Colorado 80202
Telephone: 303-813-1200
Email: Melito@melitolaw.com

VERIFICATION

Out of State Counsel's Verified Motion Requesting Pro Hac Vice Admission was sworn to or affirmed and signed by Michael Melito [Name of Sponsoring Attorney and Registration No.] this 14th day of September 2023

Christa Lundquist
[Notary Public]

My commission expires: July 22, 2026

**CHRISTA LUNDQUIST
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 20224028731
MY COMMISSION EXPIRES JULY 22, 2026**

and



MICHAEL MELITO
(CO Bar No. 36059)
MELITO LAW, LLC
1875 Lawrence St., Ste. 730

Denver, Colorado 80202
Telephone: 303-813-1200
Email: Melito@melitolaw.com

VERIFICATION

Out of State Counsel's Verified Motion Requesting Pro Hac Vice Admission was sworn to or affirmed and signed by Michael Melito [Name of Sponsoring Attorney and Registration No.] this 14th day of September, 2023

Christa Lundquist
[Notary Public]

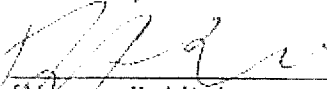
My commission expires: July 22, 2026

**CHRISTA LUNDQUIST
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 20224028731
MY COMMISSION EXPIRES JULY 22, 2026**

VERIFICATION

Out of State Counsel's Verified Motion Requesting Pro Hac Vice Admission
was sworn to or affirmed and signed by _____

Jay Alan Sekulow, DC Bar #496335, this 14th day of Sept, 2023.



[Notary Public]

My commission expires: March 16, 2026

