

IN THE SUPREME COURT OF THE STATE OF KANSAS

HODES & NAUSER, MDs, P.A., et al., )  
 )  
 *Appellee,* )  
 )  
 v. )  
 )  
 DEREK SCHMIDT, in his official capacity )  
 as Attorney General of the State of Kansas, )  
 et al., )  
 )  
 *Appellant.* )  
 \_\_\_\_\_ )

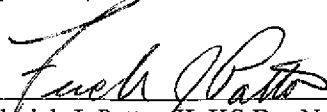
No. 114,153

**MOTION FOR ADMISSION OF TERESA S. COLLETT PRO HAC VICE**

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

COMES NOW Frederick J. Patton, an attorney of record in the above captioned case, and moves for the admission *pro hac vice* of Teresa S. Collett. I am regularly engaged in the practice of law in Kansas, in good standing with the Kansas Supreme Court, and request the admission of Teresa S. Collett, who is an attorney regularly engage in the practice of law and in good standing in Oklahoma and Texas, pursuant to the rules of the highest appellate court in those jurisdictions. 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 Teresa S. Collett to practice law in the Supreme Court of Kansas for purposes of this case only. Please find attached the verified application of Teresa S. Collett. The \$100.00 nonrefundable fee was paid upon filing.

Respectfully submitted,

  
\_\_\_\_\_  
Frederick J. Patton II, KS Bar No. 09397  
PATTON AND PATTON, CHARTERED  
534 S. Kansas Ave, Ste 1120  
Topeka, KS 66603  
(785) 273-4330  
joe@joepatton.com  
Attorney for Kansans for Life

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the above and foregoing **MOTION FOR ADMISSION OF TERESA S. COLLETT *PRO HAC VICE* and VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE*** was filed with the Clerk of the Court and served on all parties below through the Court's electronic filing system on December 6, 2016:

MARK P JOHNSON  
LEE THOMPSON  
DENNIS D DEPEW  
ROBER V EYE  
STEPHEN DOUGLAS BONNEY  
ERIN C THOMPSON  
STEPHEN MCALLISTER  
DON P. SAXTON  
BRETT ALLEN JARMER  
MARY ELLEN ROSE  
JEFFREY A CHANAY  
SHON D QUALSETH  
SARAH E WARNER

And by U.S. Mail, postage prepaid to:

SOUVIK SAHA  
SKYE L. PERRYMAN  
BRITTANI KRIKPATRICK IVEY  
KIMBERLY A. PARKER  
Wilmer Cutler Pickering Hale & Dorr, LLP  
1875 Pennsylvania Ave., N.W.  
Washington, D.C. 20006

PAUL BENJAMIN LINTON  
Special Counsel  
Thomas More Society  
921 Keystone Ave.  
Northbrook, IL 60062

Teresa Woody  
The Woody Law Firm, PC  
1621 Baltimore Ave  
Kansas City, MO 64108

DAVID H. GANS  
BRIANNE J. GOROD  
Constitutional Accountability Center  
1200 18<sup>th</sup> Street, NW, Suite501  
Washington, DC 20036

GENEVIEVE SCOTT  
JANET CREPPS  
ZOE LEVINE  
Center for Reproductive Rights  
199 Water Street, 22<sup>nd</sup> Floor  
New York, NY 10038



Frederick J. Patton II, KS Bar No. 09397  
PATTON AND PATTON, CHARTERED  
534 S. Kansas Ave, Ste 1120  
Topeka, KS 66603  
(785) 273-4330  
joe@joepatton.com  
Attorney for Kansans for Life

IN THE SUPREME COURT OF THE STATE OF KANSAS

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

Plaintiff-Appellees, )

Case No. 114153

vs. )

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

Defendant-Appellants. )

VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE*

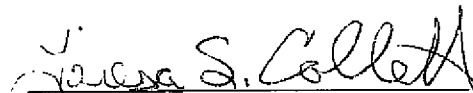
Teresa S. Collett, an out-of-state attorney, seeks admission to practice law in Kansas in this particular appeal.

1. *Background.* My name is: Teresa Stanton Collett. I am regularly engaged in the practice of law and in good standing in the states of Oklahoma and Texas according to the rules of the highest appellate court in that jurisdiction.
2. *Authority.* Supreme Court Rule 1.10.  
I am aware that, if this application is granted, I will be subject to the order of, and amenable to disciplinary action by, the Kansas appellate courts. In support of my application I state the following:
3. I seek to represent Kansans for Life, Inc. in this appeal.
4. Local counsel Frederick J. Patton, Supreme Court registration 09397, conducts business from Patton & Patton, Chartered, 534 S. Kansas, Suite


1120, Topeka, Kansas 66603, Telephone (785) 273-4330 Fax (785)-354-1901, email Joe@joepatton.com.

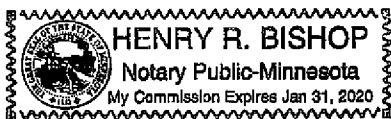
5. My residential and business address is 1824 Stanford Avenue, Saint Paul, Minnesota. My business phone number is 651-271-2958 and my e-mail address is Teresa.S.Collett@gmail.com. I do not have a fax number related to my law practice.
6. I am admitted to the following bar(s): Oklahoma, admitted on October 15, 1986, bar # 11793 and Texas State Bar, admitted on June 28, 2001, bar # 24033514.
7. I am a member in good standing of each of the above bars.
8. I have not been the subject of prior public discipline, including but not limited to suspension or disbarment, in any jurisdiction.
9. No disciplinary action or investigation is currently pending against me in any jurisdiction.
10. Within the preceding 12 months, I have not been admitted *pro hac vice* in Kansas.

I swear or affirm that all of this 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 appellate courts if a change occurs in any of the information provided.



Teresa S. Collett  
1824 Stanford Avenue  
Saint Paul, MN 55105  
c: 651-271-2958  
Teresa.S.Collett@gmail.com

Notary:   
Expiration Date of Notary: January 31, 2020  
County & State: Hennepin County, Minnesota



## CERTIFICATE OF SERVICE

I certify that a true and correct copy of this Verified Application was sent by United States Mail, postage prepaid, on 6<sup>th</sup> of December, 2016 to:

Jeffrey A. Chanay  
Chief Deputy Attorney General  
Dennis D. Depew  
Deputy Attorney General  
Office of the Attorney General  
Memorial Building 3<sup>rd</sup> Floor  
120 SW Tenth Ave  
Topeka, Kansas 66612-1597

Janet Crepps  
Genevieve Scott  
Zoe Levine  
Center for Reproductive Rights  
199 Water Street, 22<sup>nd</sup> Floor  
New York, New York, 10038

Shon D. Qualseth  
Stephen R. McAllister  
Sarah E. Warner  
333 West 9th Street  
PO Box 1264  
Lawrence, Kansas 66044-2803

Robert V. Eye  
Brett A. Jarner  
Robert V. Eye Law Office, LLC  
4840 Bob Billings Pkway,  
Suite 1000, Lawrence, Ks  
66049

Mary Ellen Rose  
10308 Metcalf Ave, #182  
Overland Park, Kansas 66212

Don Saxton  
Saxton Law Firm LLC  
1000 Broadway, Suite 400  
Kansas City, MO 64105

Christopher Gacek  
Counsel  
Family Research Council  
801 G Street, N.W.  
Washington, D.C. 20001

Don Saxton  
Saxton Law Firm LLC  
1000 Broadway, Suite 400  
Kansas City, MO 64105

Teresa Woody, The Woody Law Firm PC,  
1621 Baltimore Ave. , Kansas City, Mo  
64108

Lee Thompson  
Thompson Law Firm LLC  
106 E 2nd  
Wichita, Kansas 67202

Mark Johnson  
Dentons US LLP  
4520 Main Suite 1100  
Kansas City, Missouri 64111-7700

Erin Thompson  
Foland, Wickens, Eisfelder, Roper & Hofer  
1200 Main Street  
Kansas City, Kansas 64105

Steven Douglas Bonney  
ACLU Foundation of Kansas  
6701 W. 64<sup>th</sup> Street, Suite 210  
Overland Park, Kansas 66202

Paul Benjamin Linton  
921 Keystone A venue  
Northbrook, Illinois 60062

Kimberly Parker  
Brittani Kirkpatrick Ivey  
Skye L. Perryman  
Souvik Saha  
Wilmer Cutler Pickering Hale & Dorr  
1875 Pennsylvania Avenue NW  
Washington, D.C. 20006

Brianne J. Gorod  
David H. Gans  
Constitutional Accountability Center  
1200 18<sup>th</sup> Street, NW  
Suite 501  
Washington, D.C. 20036



Teresa S. Collett  
1824 Stanford Avenue  
Saint Paul, MN 55105  
c: 651-271-2958  
Teresa.S.Collett@gmail.com

Oklahoma Bar # 11793  
Texas Bar # 24033514