

IN THE COURT OF APPEALS FOR THE STATE OF KANSAS

<b>HODES &amp; NAUSER, MDs, P.A.;</b>	)	
<b>HERBERT C. HODES, M.D.; and</b>	)	
<b>TRACI LYNN NAUSER, M.D.,</b>	)	
	)	
	)	
	)	
	)	<b>Appellate Court Case # 15-114153-A</b>
<b>Plaintiffs-Appellees,</b>	)	<b>Trial Court Case # 2015-CV-490, Div. 6</b>
	)	
<b>v.</b>	)	
	)	
	)	
<b>DEREK SCHMIDT, in his official</b>	)	
<b>capacity as Attorney General</b>	)	
<b>of the State of Kansas; and STEPHEN M.</b>	)	
<b>HOWE, in his official capacity as District</b>	)	
<b>Attorney for Johnson County,</b>	)	
	)	
	)	
	)	
<b>Defendants-Appellants.</b>	)	

**MOTION FOR ADMISSION PRO HAC VICE**  
(Pursuant to K.S.A. Chapter 60)

COMES NOW Bob Eye, an attorney of record in the above captioned case, and moves for the admission *pro hac vice* of Janet Crepps. I am regularly engaged in the practice of law in Kansas, in good standing with the Kansas Supreme Court, and request the admission of Janet Crepps, who is an attorney regularly engaged in the practice of law and in good standing in Alaska and South Carolina, pursuant to the rules of the highest appellate court in that jurisdiction.

I will be actively engaged in the conduct of this case; will sign all pleadings, documents, and briefs; and will be present at oral argument, if scheduled. I respectfully request the admission *pro hac vice* of Janet Crepps to practice law in the district and appellate courts of Kansas for purposes of this case only.

Please find attached the verified application of Janet Crepps and the \$100.00 non-refundable fee.

Dated: September 28<sup>th</sup>, 2015  
Topeka, KS

Respectfully submitted,

/s/ Robert V. Eye  
Robert V. Eye, KS Bar #10689  
Robert V. Eye Law Office, LLC  
4840 Bob Billings Parkway, Suite 1010  
Lawrence, KS 66049  
(785) 234-4040  
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Attorney for Plaintiffs

IN THE COURT OF APPEALS FOR 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 # 15-114153-A**  
**Trial Court Case # 2015-CV-490, Div. 6**

**VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE***

**An out-of-state attorney seeks admission to practice law in Kansas in this particular appeal.**

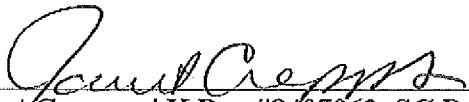
1. My name is Janet Crepps. I am regularly engaged in the practice of law and in good standing in both South Carolina and Alaska according to the rules of the highest appellate court in that jurisdiction.
2. I am aware that, if this application is granted, I will be subject to the order of, and amendable to disciplinary action by, the Kansas appellate courts. In support of my application I state the following:
  - A. I, along with local counsel, represent Appellees Hodes & Nausser, MDs, PA, Dr. Herbert Hodes, MD, and Dr. Traci Nausser, MD, on behalf of themselves and their current and

future patients seeking termination of pregnancy medical services.

- B. Local counsel are Bob Eye, Kansas Bar #10689, Robert V. Eye Law Office, 123 SE 6<sup>th</sup> Avenue, Suite 200, Topeka, KS 66603, Phone (785) 234-4040, Fax (785) 234-4046, [bob@kauffmaneye.com](mailto:bob@kauffmaneye.com); Erin Thomson, Kansas Bar #22117, Thompson Law Firm, 106 E. 2<sup>nd</sup> Street, Wichita, KS 67202, Phone (316) 267-3933, Fax (316) 267-3901, [ethompson@slawfirm.com](mailto:ethompson@slawfirm.com); and Teresa Woody, Kansas Bar #16949, The Woody Law Firm, 1621 Baltimore Ave, Kansas City, MO 64108, Phone (816) 421-4246, Fax (816) 471-4883, [teresa@woodylawfirm.com](mailto:teresa@woodylawfirm.com).
- C. My residence and home office address is 2108 Bethel Road, Simpsonville, SC 29681. The Center for Reproductive Rights has headquarters at 199 Water Street, 22<sup>nd</sup> Floor, New York, NY 10038. My business phone number is (864) 962-8519, and my business fax number is (917) 637-3666. My email address is [jcrepps@reprorights.org](mailto:jcrepps@reprorights.org).
- D. I was admitted to the Alaska Bar on 6/17/84, registration #8407062, and to the South Carolina Bar on 11/16/98, registration #15902.
- E. I am a member in good standing of the above bars.
- F. I have not been the subject of prior public discipline, including but not limited to suspension or disbarment, in any jurisdiction.
- G. No disciplinary action or investigation is currently pending against me in any jurisdiction.
- H. I have not been admitted *pro hac vice* by any Kansas court in the past 12 months; however a motion and application for *pro hac* admission is currently pending in the District Court in this case, Civil Action #15-CV-490.

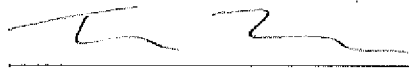
I swear or affirm that all of the above information is true and correct to the best of my knowledge. I understand that I remain under a continuing obligation to notify the Clerk of the

Appellate Courts if a change occurs in any of the information provided.

By:   
Janet Crepps, AK Bar #8407062, SC Bar #15902  
Center for Reproductive Rights  
2108 Bethel Road  
Simpsonville, SC 29681  
(864) 962-8519  
[jcrepps@reprorights.org](mailto:jcrepps@reprorights.org)

ATTORNEY FOR PLAINTIFFS

SUBSCRIBED AND SWORN TO before me this 29 day of September, 2015.



NOTARY PUBLIC

My Commission Expires:

March 24, 2018

TISEME G. ZEGEYE  
NOTARY PUBLIC-STATE OF NEW YORK  
No. 02ZE6299870  
Qualified in New York County  
My Commission Expires March 24, 2018

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of this **VERIFIED APPLICATION** was sent by via electronic mail on 9/29, 2015, to:

Shon D. Qualseth  
Stephen R. McAllister  
Sarah E. Warner  
Thompson Ramsdell Qualseth & Warner PA  
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Overland Park, KS 66211

  
**GENEVIEVE SCOTT**  
**ATTORNEY FOR PLAINTIFFS**