

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**LA UNIÓN DEL PUEBLO ENTERO,  
FRIENDSHIP-WEST BAPTIST CHURCH,  
THE ANTI-DEFAMATION LEAGUE  
AUSTIN, SOUTHWEST, AND TEXOMA  
REGIONS, SOUTHWEST VOTER  
REGISTRATION EDUCATION PROJECT,  
TEXAS IMPACT, MEXICAN AMERICAN  
BAR ASSOCIATION OF TEXAS, TEXAS  
HISPANICS ORGANIZED FOR POLITICAL  
EDUCATION, JOLT ACTION, WILLIAM C.  
VELASQUEZ INSTITUTE, FIEL HOUSTON  
INC., ISABEL LONGORIA, and JAMES  
LEWIN,**

**Plaintiffs,**

**v.**

**GREGORY W. ABBOTT, in his official  
capacity as Governor of Texas, JOSE A.  
ESPARZA, in his official capacity as Deputy  
Secretary of State of Texas, WARREN K.  
PAXTON, in his official capacity as Attorney  
General of Texas, and LUPE C. TORRES, in  
her official capacity as Medina County Elections  
Administrator,**

**Defendants.**

**Case No. 5:21-cv-0844**

**MOTION FOR ADMISSION PRO HAC VICE**

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now Matthew Berde, applicant herein, and moves this Court to grant admission to the United States District Court for the Western District of Texas pro hac vice to represent Plaintiffs Friendship-West Baptist Church, the Anti-Defamation League Austin, Southwest, and Texoma Regions, Texas Impact, Isabel Longoria, and James Lewin, in this case, and would respectfully show the Court as follows:

1. Applicant is an attorney and a member of the law firm (or practices under the name of) Weil, Gotshal & Manges LLP with offices at:  
  
Mailing address: 200 Crescent Court, Suite 300  
  
City, State, Zip Code: Dallas, Texas 75201  
  
Telephone: 214-746-7889 Facsimile: 214-746-7777
2. Since April 2015, Applicant has been and presently is a member of and in good standing with the Bar of the State of Texas.  
  
Applicant's bar license number is 24094379.
3. Applicant has been admitted to practice before the following courts:  
  
Court: Admission date:  
California December 5, 2008
4. Applicant is presently a member in good standing of the bars of the courts listed above, except as provided below (list any court named in the preceding paragraph before which Applicant is no longer admitted to practice): Status is inactive in California.
5. I ☐ have ☒ have not previously applied to Appear Pro Hac Vice in this district court in Case[s]:
6. Applicant has never been subject to grievance proceedings or involuntary removal proceedings while a member of the bar of any state or federal court, except as provided: N/A.
7. Applicant has not been charged, arrested, or convicted of a criminal offense or offenses, except as provided below (omit minor traffic offenses): N/A.

8. Applicant has read and is familiar with the Local Rules of the Western District of Texas and will comply with the standards of practice set out therein.
9. Applicant will file an Application for Admission to Practice before the United States District Court for the Western District of Texas, if so requested; or  
Applicant has co-counsel in this case who is admitted to practice before the United States District Court for the Western District of Texas.

Co-counsel: Elizabeth Y. Ryan  
Mailing address: 200 Crescent Court, Suite 300  
City, State, Zip Code: Dallas, Texas 75201  
Telephone: 214-746-8158

Should the Court grant applicant's motion, Applicant shall tender the amount of \$100.00 pro hac vice fee in compliance with Local Court Rule AT-1(f)(2) [checks made payable to: Clerk, U.S. District Court].

Wherefore, Applicant prays that this Court enter an order permitting the admission of Matthew Berde to the Western District of Texas pro hac vice for this case only.

Respectfully submitted,

Matthew Berde

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[printed name of Applicant]



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[signature of Applicant]

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a true and correct copy of this motion upon each attorney of record and the original upon the Clerk of Court on this the 8th day of September, 2021.

Matthew Berde

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[printed name of Applicant]



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[signature of Applicant]