

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

---

40 DAYS FOR LIFE OF WAUSAU, an	)	
unincorporated association, and THERESA	)	
WHITAKER, JANET KRAIMER-NICHOLS,	)	
and MARY LITSCHAUER, individuals,	)	
	)	
Plaintiffs,	)	
vs.	)	Case No. 11-cv-231
	)	
RALPH ILLICK, MARATHON COUNTY	)	
PUBLIC LIBRARY, TIM GIERL, AUDREY	)	
ASCHER, GARY BEASTROM, KEN DAY,	)	
ALISON MORROW, KATIE ROSENBERG,	)	
SCOTT WINCH, MARATHON COUNTY,	)	
WISCONSIN, a body politic, and	)	
KEITH LANGENHAHN,	)	
	)	
Defendants.	)	

---

**MOTION FOR ADMISSION PRO HAC VICE**

NOW COME the Plaintiffs, 40 Days for Life of Wausau, Theresa Whitaker, Janet Kraimer-Nichols, and Mary Litschauer, by their attorneys Axley Brynelson, LLP, by Lori M. Lubinsky, and move the Court for an order admitting attorneys Peter C. Breen, Thomas Olp, and David L. Heaton *pro hac vice*.

1. Attorney Lori M. Lubinsky is licensed to practice law in the State of Wisconsin and is admitted to practice before the United States District Court for the Western District of Wisconsin.

2. Attorney Peter Breen is the Executive Director & Legal Counsel of the Thomas More Society, and his office address, telephone number and e-mail address are:

Thomas More Society  
29 S LaSalle, Ste 440  
Chicago, IL 60603  
(312) 782-1680  
email: [pbreen@thomasmoresociety.org](mailto:pbreen@thomasmoresociety.org)

Attorney Breen is a member in good standing of the bar of the State of Illinois and is admitted to practice before the United States District Court for the Northern District of Illinois, the United States Court of Appeals for the Seventh Circuit, and the United States Patent & Trademark Office.

3. Attorney Thomas Olp is an attorney in Illinois, and his office address, telephone number and e-mail address are:

2111 Comprehensive Drive  
Aurora, IL 60505  
630-851-4722 x4202  
Email: [tolp@conwin.com](mailto:tolp@conwin.com)

Attorney Olp is a member in good standing of the bar of the State of Illinois and is admitted to practice before the United States District Court for the Northern District of Illinois.

4. Attorney David L. Heaton is an attorney in Wisconsin, and his office address, telephone number and e-mail address are:

8007 East Jefferson Street  
Wausau, WI 54403  
312-919-9910  
Email: [david@myheaton.com](mailto:david@myheaton.com)

Attorney Heaton is a member in good standing of the bar of the State of Illinois.

5. The Thomas More Society, by attorney Peter C. Breen, and attorneys Thomas Olp and David L. Heaton have been retained to represent Plaintiffs in this lawsuit. The law firm of Axley Brynson, LLP, by Attorney Lori M. Lubinsky, has been retained as local counsel on behalf of Plaintiffs.

WHEREFORE, the undersigned attorney respectfully moves the Court for admission *pro hac vice* of attorneys Peter C. Breen, Thomas Olp, and David L. Heaton.

Respectfully submitted,

AXLEY BRYNELSON, LLP

Dated: March 30, 2011

By: /s/ Lori M. Lubinsky  
Lori M. Lubinsky  
Attorneys for Plaintiffs  
2 East Mifflin Street, Suite 200  
Madison, Wisconsin 53703  
Telephone: (608) 257-5661  
Facsimile: (608) 257-5444  
[llubinsky@axley.com](mailto:llubinsky@axley.com)

F:\EAFDATA\16774\66584\00844550.DOC