

04-CV-2688

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

IN THE MATTER OF APPLICATION FOR: Benjamin W. Bull

ADMISSION TO PRACTICE IN THIS COURT: U.S. District Court  
Middle District of Pennsylvania

**PETITION**

I, Benjamin W. Bull, hereby petition the United States District Court for the Middle District of Pennsylvania to admit me to practice before that Court. In support of my petition, I state as follows:

My office address is:	Office Telephone:
Alliance Defense Fund 15333 N. Pima Road, Suite 165 Scottsdale, Arizona 85260	(480) 444-0020

I was admitted to practice before the Courts listed below on the date shown after the name of each Court, and I am currently a member in good standing of all those Courts.

Please see the attached list.

My attorney Identification number is: Ariz. Bar No. 009940

<b>FOR COURT USE ONLY</b>	
<input type="checkbox"/> GENERAL ADMISSION:	
BEFORE JUDGE _____	Date: _____
<small>U.S. DISTRICT JUDGE U.S. MAGISTRATE JUDGE</small>	
<input type="checkbox"/> SPECIAL ADMISSION:	
GRANTED _____	Date: _____
<small>U.S. DISTRICT JUDGE U.S. MAGISTRATE JUDGE</small>	

Please Answer the Following Questions:

All occasions, if any, on which I have been convicted of a crime (subsequent to my becoming an attorney), censured, suspended, disciplined or disbarred by any court are set forth as follows:

(State the facts and circumstances connected with each; if none, state "none".)

**None.**

All occasions, if any, on which I have been held in contempt of court are set forth as follows:

(State the nature and final disposition of contempt; if none, state "none".)

**None.**

I **do not**, have any disciplinary action, contempt or other proceedings involving me pending before any court.

I am seeking:

    X     Special Admission (specify by a check which rule) under  
Local Rule LR 83.9.3     X    

The basis for my admission under Local Rule 83.9.3 is as follows:

To represent Intervention Applicant Foundation For Thought and Ethics in the below case.

**NAME THE PARTY YOU REPRESENT:**

Foundation for Thought and Ethics (Applicant for Intervention)

If special admission is requested for a particular case, please list case number and caption:

Case #:     4:04-cv-2688    

Caption:     Kitzmilller v. Dover Area School District

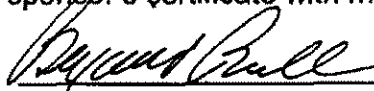
I understand that:

- 1) If seeking admission under Section LR 83.9.1 or LR 83.9.2, I must submit a letter from a superior stating the agency with which I am employed and the duties performed which qualify me for admission under those sections.
- 2) If petitioning for admission, only in a particular case, under Rule LR 83.9.3, I need no sponsor's certificate. Any attorney specially admitted under LR 83.9.3, shall, in each proceeding in which he or she appears, have associate counsel who is generally admitted under Local Rule 83.8 to practice in this court, whose appearance shall also be entered of record and upon whom all pleadings, motions, notices, and other papers may be served in accordance with any statute or applicable rule. The attendance of any such associate counsel upon the hearing of any motion or the taking of any testimony shall be sufficient appearance for the party or parties represented by such associate counsel. Either the specially admitted attorney or associate counsel must be fully prepared to participate in any hearings, arguments, conferences and trials. (See LR 83.12)

If special admission is requested for a particular case, please list the name, address, telephone number and bar identification number of associate counsel to be entered of record in the case:

Leonard G. Brown, III, Esq.      PA I.D. No. 83207  
CLYMER & MUSSER, P.C.  
Lancaster, PA 17602  
(717) 299-7101

- 3) If seeking regular admission under Rule LR 83.8.1, I must have a sponsor who is a member in good standing of the Bar of this Court present to move for my admission and I must submit the sponsor's certificate with my petition.

  
\_\_\_\_\_  
PETITIONER  
Ariz. Bar No. 009940  
\_\_\_\_\_  
(Bar Identification Number)  
5/24/05  
\_\_\_\_\_  
(Date)

NAME OF PETITIONER: Benjamin W. Bull

**Additional Information for Benjamin W. Bull**

Applicant has voluntarily placed himself on inactive status in the Mississippi State Bar. No sanctions or investigatory proceedings were involved.

**Court Admissions for Benjamin W. Bull**

United States Court of Appeals for the 4<sup>th</sup> Circuit - May 29, 1979

United States Court of Appeals for the 5<sup>th</sup> Circuit - March 25, 1985

United States Court of Appeals for the 6<sup>th</sup> Circuit - March 25, 1985

United States Court of Appeals for the 8<sup>th</sup> Circuit - April 26, 1989

United States Court of Appeals for the 9<sup>th</sup> Circuit - February 11, 1985

United States Court of Appeals for the 11<sup>th</sup> Circuit - February 11, 1985

United States Court of Appeals for the District of Columbia - September 18, 1985

District of Columbia Court of Appeals - May 1, 1985

U.S. District Court, District of Eastern Virginia - August 3, 1977

U.S. District Court, District of Northern California - April 1, 1991

U.S. District Court, District of Arizona - June 10, 1985

State of Arizona Supreme Court - May 18, 1985

State of Virginia Supreme Court - October 6, 1975

United States Supreme Court - May 21, 1979

Member of the Virginia Bar - September 30, 1975

**SPONSOR'S CERTIFICATE:**

I, Leonard G. Brown, III, am a member in good standing of the Bar of the United States District Court for the Middle District of Pennsylvania, having been admitted to practice on Jan (month) 10 (day), 2001 (year). I have known the above petitioner for 3 years. To my knowledge, the petitioner's moral character is as follows:

Impeccable.

To my knowledge, the petitioner's educational background and experience are as follows:

Benjamin W. Bull has been practicing law, primarily litigation, for over twenty-nine years. He is the Chief Counsel of the Alliance Defense Fund (ADF), a non-profit public interest law firm. With ADF, Mr. Bull engages in active litigation, and supervises over twenty-three full-time attorneys involved in constitutional rights litigation. In addition, Mr. Bull oversees the litigation activities of over seven-hundred attorneys who are affiliated with ADF.

Mr. Bull served as Senior Counsel for The American Center for Law and Justice ("ACLJ"), from 1993 through 2000 in a litigation and supervisory capacity in cases involving constitutional rights.

Mr. Bull also served as Executive Director and Senior Counsel of The European Center for Law and Justice in Strasbourg, France from mid-1998 to 2000. There he assisted religious liberty attorneys throughout Europe in human rights litigation under the European Convention on Human Rights before the European Court of Human Rights. Mr. Bull also supervised an office of four attorneys in Moscow, Russia practicing in the area of religious liberties.

Mr. Bull was General Counsel of the American Family Association Law Center ("AFA"), located in Tupelo, Mississippi from 1990 to 1993. With AFA, Mr. Bull primarily litigated First Amendment issues in state and federal courts from California to New York and supervised an office of five litigation attorneys.

Mr. Bull served as Corporate Counsel for American Continental Corporation from 1989 to 1990. In that capacity, Mr. Bull served a litigation role supervising, coordinating, and assisting in all litigation involving the corporation.

Mr. Bull served as Legal Counsel and ultimately as General Counsel of the Children's Legal Foundation ("CLF") from 1984 to 1989. CLF was a public interest legal organization concerned with the victimization of children and women through pornography. In that capacity, he litigated cases involving First Amendment issues related to pornography in state and federal courts across the country.

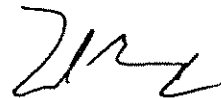
Mr. Bull served as Deputy County Attorney for Fairfax County, Virginia from 1981 to 1984, where he was a principal litigation attorney for a large county in the metropolitan Washington, D.C. area.

Mr. Bull served as Assistant City Attorney for Norfolk, Virginia from 1975-1981. He served both as City prosecutor and represented the City in § 1983 litigation.

In 1975 Benjamin W. Bull graduated from the University of South Carolina Law School (J.D.).

Mr. Bull has practiced extensively in the First Amendment area. For most of the last fifteen years his practice has focused almost exclusively on First Amendment issues. He receives numerous telephone calls and letters from attorneys and non-attorneys alike on a daily basis asking for his counsel and assistance in First Amendment cases or potential cases.

I, Leonard G. Brown, III do hereby sponsor and recommend Benjamin W. Bull for admission as a qualified attorney to practice before this court.



---

Leonard G. Brown, III, Esq.  
CLYMER & MUSSER, P.C.,  
23 N. Lime Street  
Lancaster, PA, 17602  
(717) 299-7101  
Atty. Bar I.D. Code No.: PA I.D. 83207

Do not pay any Federal Reserve Bank of  
Scranton, PA

Fri Jun 3 14:04:00 2005

UNITED STATES DISTRICT COURT

SCRANTON, PA

Receipt No. 333 101864  
Cashier jina

Tender Type CHECK

Check Number: 019196

Transaction Type C

Case No./Def No. 3:05-PB-1 / 1

DB Code	Div No	Acct
4667	3	6855XX

Amount \$ 25.00

SP ADM/BENJAMIN W BULL/04-CV-2688

ALLIANCE DEFENSE FUND 15333 N. PIMA  
RD STE 165 SCOTTSDALE, AR 85260

cn

04-CV-2688

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

IN THE MATTER OF APPLICATION FOR: Gary S. McCaleb  
ADMISSION TO PRACTICE IN THIS COURT: U.S. District Court  
Middle District of Pennsylvania

**PETITION**

I, Gary S. McCaleb, hereby petition the United States District Court for the Middle District of Pennsylvania to admit me to practice before that Court. In support of my petition, I state as follows:

My office address is: Office Telephone:  
Alliance Defense Fund (480) 444-0020  
15333 N. Pima Road, Suite 165  
Scottsdale, Arizona 85260

I was admitted to practice before the Courts listed below on the date shown after the name of each Court, and I am currently a member in good standing of all those Courts.

- Supreme Court of Arizona, admitted May 21, 1998;
- U.S. District Court, Arizona, admitted November 23, 1998;
- U.S. District Court, Colorado, admitted August 3, 1999;
- U.S. District Court, Western District of Michigan, admitted February 20, 2004;
- U.S. Court of Appeals, 9th Circuit, admitted February 4, 2000; and
- U.S. Court of Appeals, 5th Circuit, admitted May 3, 2004.

My attorney Identification number is: Ariz. Bar No. 018848

<b>FOR COURT USE ONLY</b>	
<input type="checkbox"/> GENERAL ADMISSION:	
BEFORE JUDGE _____	Date: _____
<small>U.S. DISTRICT JUDGE U.S. MAGISTRATE JUDGE</small>	
<input type="checkbox"/> SPECIAL ADMISSION:	
GRANTED _____	Date: _____
<small>U.S. DISTRICT JUDGE U.S. MAGISTRATE JUDGE</small>	



Please Answer the Following Questions:

All occasions, if any, on which I have been convicted of a crime (subsequent to my becoming an attorney), censured, suspended, disciplined or disbarred by any court are set forth as follows:

(State the facts and circumstances connected with each; if none, state "none".)

**None.**

All occasions, if any, on which I have been held in contempt of court are set forth as follows:

(State the nature and final disposition of contempt; if none, state "none".)

**None.**

I **do not** have any disciplinary action, contempt or other proceedings involving me pending before any court.

I am seeking:

  X   Special Admission (specify by a check which rule) under

Local Rule LR 83.9.3   X  

The basis for my admission under Local Rule 83.9.3 is as follows:

To represent Intervention Applicant Foundation for Thought and Ethics in the below case.

**NAME THE PARTY YOU REPRESENT:**

Foundation for Thought and Ethics (Applicant for Intervention)

If special admission is requested for a particular case, please list case number and caption:

Case #: **4:04-cv-2688**

Caption: *Kitzmilller v. Dover Area School District*

I understand that:

- 1) If seeking admission under Section LR 83.9.1 or LR 83.9.2, I must submit a letter from a superior stating the agency with which I am employed and the duties performed which qualify me for admission under those sections.
- 2) If petitioning for admission, only in a particular case, under Rule LR 83.9.3, I need no sponsor's certificate. Any attorney specially admitted under LR 83.9.3, shall, in each proceeding in which he or she appears, have associate counsel who is generally admitted under Local Rule 83.8 to practice in this court, whose appearance shall also be entered of record and upon whom all pleadings, motions, notices, and other papers may be served in accordance with any statute or applicable rule. The attendance of any such associate counsel upon the hearing of any motion or the taking of any testimony shall be sufficient appearance for the party or parties represented by such associate counsel. Either the specially admitted attorney or associate counsel must be fully prepared to participate in any hearings, arguments, conferences and trials. (See LR 83.12)

If special admission is requested for a particular case, please list the name, address, telephone number and bar identification number of associate counsel to be entered of record in the case:

Leonard G. Brown, III, Esq.      PA I.D. 83207  
CLYMER & MUSSER, P.C.  
Lancaster, PA 17602  
(717) 299-7101

- 3) If seeking regular admission under Rule LR 83.8.1, I must have a sponsor who is a member in good standing of the Bar of this Court present to move for my admission and I must submit the sponsor's certificate with my petition.

  
\_\_\_\_\_  
PETITIONER

Ariz. Bar No. 018848  
\_\_\_\_\_  
(Bar Identification Number)

5/27/2005  
\_\_\_\_\_  
(Date)

NAME OF PETITIONER: Gary S. McCaleb

SPONSOR'S CERTIFICATE:

I, Leonard G. Brown, III, am a member in good standing of the Bar of the United States District Court for the Middle District of Pennsylvania, having been admitted to practice on Jan (month) 10 (day), 2001 (year). I have known the above petitioner for 1 year. To my knowledge, the petitioner's moral character is as follows:

Impeccable.


To my knowledge, the petitioner's educational background and experience are as follows:

Gary S. McCaleb is a Senior Litigation Staff Attorney with the Alliance Defense Fund (ADF), a non-profit public interest law firm. In this capacity, Mr. McCaleb practices almost exclusively in the areas of civil rights, particularly free speech and religious liberties rights. He practices primarily in federal court and has either litigated or assisted in litigation in numerous cases in the United States Supreme Court, circuit courts of appeal, and district courts, including oral arguments in bench trials. Mr. McCaleb has also practiced in Arizona and California state courts. He is involved in all aspects of litigation, including research, drafting and filing briefs, discovery, and oral arguments, as well as supervising over 9 attorneys and 4 support staff.

Mr. McCaleb graduated with honors from Regent University (J.D.) in 1997 and has made numerous *pro hac vice* appearances in several other federal district courts.

Mr. McCaleb is a member in good standing with the Arizona and federal bars, and there have been no disciplinary actions of any sort alleged or pending against him in any court or bar within which he has practiced. He has never been held in contempt of court, censured, disbarred, or suspended by any court.

I, Leonard G. Brown, III do hereby sponsor and recommend Gary S. McCaleb for admission as a qualified attorney to practice before this court.



---

Leonard G. Brown, III, Esq.  
CLYMER & MUSSER, P.C.,  
23 N. Lime Street  
Lancaster, PA, 17602  
(717) 299-7101  
Atty. Bar I.D. Code No.: PA I.D. 83207

Fri Jun 3 14:02:07 2005

UNITED STATES DISTRICT COURT

SCRANTON , PA

Receipt No. 333 101863  
Cashier gina

Tender Type CHECK

Check Number: 19197

Transaction Type C

Case No./Def No. 3:05-PB-1 / 1

DE Code	Div No	Acct
4667	3	6853XX

Amount \$ 25.00

SP ADM/GARY S MCCLELL/04-CV-2688

ALLIANCE DEFENSE FUND 15333 N. PINA  
RD STE 165 SCOTTSDALE, AR 85260

cn

04-cv-2688

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

IN THE MATTER OF APPLICATION FOR: Elizabeth A. Murray  
ADMISSION TO PRACTICE IN THIS COURT: U.S. District Court  
Middle District of Pennsylvania

**PETITION**

I, Elizabeth A. Murray, hereby petition the United States District Court for the Middle District of Pennsylvania to admit me to practice before that Court. In support of my petition, I state as follows:

My office address is: Office Telephone:  
Alliance Defense Fund (480) 444-0020  
15333 N. Pima Road, Suite 165  
Scottsdale, Arizona 85260

I was admitted to practice before the Courts listed below on the date shown after the name of each Court, and I am currently a member in good standing of all those Courts.

Supreme Court of Missouri 9/17/03  
Supreme Court of Arizona 5/21/04  
U.S. District Court for the Western District of Missouri 9/26/03  
U.S. District Court for the District of Arizona 6/14/04  
U.S. District Court for the Western District of Michigan 8/18/04

My attorney Identification number is: AZ 022954 MO 52891

<b>FOR COURT USE ONLY</b>	
<input type="checkbox"/> GENERAL ADMISSION:	
BEFORE JUDGE _____	Date: _____
<small>U.S. DISTRICT JUDGE U.S. MAGISTRATE JUDGE</small>	
<input type="checkbox"/> SPECIAL ADMISSION:	
GRANTED _____	Date: _____
<small>U.S. DISTRICT JUDGE U.S. MAGISTRATE JUDGE</small>	

Please Answer the Following Questions:

All occasions, if any, on which I have been convicted of a crime (subsequent to my becoming an attorney), censured, suspended, disciplined or disbarred by any court are set forth as follows:

(State the facts and circumstances connected with each; if none, state "none".)

**None.**

All occasions, if any, on which I have been held in contempt of court are set forth as follows:

(State the nature and final disposition of contempt; if none, state "none".)

**None.**

I do not have any disciplinary action, contempt or other proceedings involving me pending before any court.

I am seeking:

    X     Special Admission (specify by a check which rule) under  
Local Rule LR 83.9.3     X    

The basis for my admission under Local Rule 83.9.3 is as follows:

To represent Intervention Applicant Foundation for Thought and Ethics in the below case.

**NAME THE PARTY YOU REPRESENT:**

Foundation for Thought and Ethics (Applicant for Intervention)

If special admission is requested for a particular case, please list case number and caption:

Case #: 4:04-cv-2688

Caption: *Kitzmiller v. Dover Area School District*

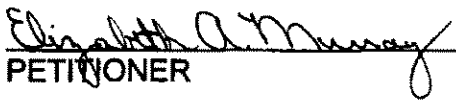
I understand that:

- 1) If seeking admission under Section LR 83.9.1 or LR 83.9.2, I must submit a letter from a superior stating the agency with which I am employed and the duties performed which qualify me for admission under those sections.
- 2) If petitioning for admission, only in a particular case, under Rule LR 83.9.3, I need no sponsor's certificate. Any attorney specially admitted under LR 83.9.3, shall, in each proceeding in which he or she appears, have associate counsel who is generally admitted under Local Rule 83.8 to practice in this court, whose appearance shall also be entered of record and upon whom all pleadings, motions, notices, and other papers may be served in accordance with any statute or applicable rule. The attendance of any such associate counsel upon the hearing of any motion or the taking of any testimony shall be sufficient appearance for the party or parties represented by such associate counsel. Either the specially admitted attorney or associate counsel must be fully prepared to participate in any hearings, arguments, conferences and trials. (See LR 83.12)

If special admission is requested for a particular case, please list the name, address, telephone number and bar identification number of associate counsel to be entered of record in the case:

Leonard G. Brown, III, Esq. PA I.D. No. 83207  
CLYMER & MUSSER, P.C.  
Lancaster, PA 17602  
(717) 299-7101

- 3) If seeking regular admission under Rule LR 83.8.1, I must have a sponsor who is a member in good standing of the Bar of this Court present to move for my admission and I must submit the sponsor's certificate with my petition.

  
PETITIONER  
AZ 022954 MO 52891  
(Bar Identification Number)  
5/26/05  
(Date)

NAME OF PETITIONER: Elizabeth A. Murray



SPONSOR'S CERTIFICATE:

I, Leonard G. Brown, III, am a member in good standing of the Bar of the United States District Court for the Middle District of Pennsylvania, having been admitted to practice on Jan (month) 10 (day), 2001 (year). I have known the above petitioner for 2 months. To my knowledge, the petitioner's moral character is as follows:


Exemplary

To my knowledge, the petitioner's educational background and experience are as follows:

Elizabeth A. Murray graduated from the University of Missouri Kansas City School of Law (J.D.) in 2003. She is licensed in the States of Missouri and Arizona as well as being admitted to the bar of the United States District Court for the Western District of Missouri, the District of Arizona, and the Western District of Michigan. Ms. Murray is a member in good standing with these organizations and has no grievance proceedings or any other disciplinary actions pending against her. Additionally, Ms. Murray has never been held in contempt of court, censured, disbarred or suspended by any court in which she has practiced.

Currently, Ms. Murray is a Litigation Staff Attorney with the Alliance Defense Fund (ADF), a non-profit public interest law firm. In this capacity, she practices in the area of religious freedom, freedom of expression, civil rights law, and other constitutional issues. She is involved in all aspects of litigation including court appearances, researching, drafting of briefs and motions, depositions, discovery, and the like. Furthermore, Ms. Murray has made several *pro hac vice* appearances in various other federal district courts.

I, Leonard G. Brown, III do hereby sponsor and recommend Elizabeth A. Murray for admission as a qualified attorney to practice before this court.

  
\_\_\_\_\_  
Leonard G. Brown, III, Esq.  
CLYMER & MUSSER, P.C.,  
23 N. Lime Street  
Lancaster, PA, 17602  
(717) 299-7101  
Atty. Bar I.D. Code No.: PA I.D. 83207

General Depository Transactions

Fri Jun 3 14:05:26 2005

UNITED STATES DISTRICT COURT

SCRANTON, PA

Receipt No. 333 101865  
Cashier gina

Tender Type CHECK

Check Number: 019198

Transaction Type C

Case No./Def No. 3:05-PB-1 / 1

BU Code	Div No	Acct
4667	3	6855XX

Amount \$ 25.00

SP ADM/ELIZABETH A MURRAY/04-CV-2688

ALLIANCE DEFENSE FUND 15333 N. PIMA  
RD STE 165 SCOTTSDALE, AR 85260

cn