

IN THE SUPREME COURT OF THE STATE OF IDAHO

COMMITTEE TO PROTECT AND PRESERVE THE IDAHO CONSTITUTION, INC.; MORMON WOMEN FOR ETHICAL GOVERNMENT; SCHOOL DISTRICT NO. 281, LATAH COUNTY, STATE OF IDAHO; IDAHO EDUCATION ASSOCIATION, INC.; JERRY EVANS; MARTA HERNANDEZ; STEPHANIE MICKELSEN; ALEXIS MORGAN, on behalf of herself and her minor children; KRISTINE ANDERSON, on behalf of herself and her minor children; each of the foregoing individually and as private attorneys general on behalf of the public of the State of Idaho,

Petitioners,

v.

STATE OF IDAHO, acting by and through the IDAHO STATE TAX COMMISSION,

Respondent.

Case No. 53264-2025

APPLICATION FOR PRO HAC VICE ADMISSION OF RENÉE D. FLAHERTY

Jason R. Mau, ISB No. 8440
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Renée Flaherty, *pro hac vice pending*
INSTITUTE FOR JUSTICE
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*Attorneys for Parent Petitioners for
Intervention*

Pursuant to Idaho State Bar Commission Rule 227, the undersigned counsel petition the Court for admission of Renée D. Flaherty, *pro hac vice*, in this case.

Renée D. Flaherty, applying counsel, certifies that she is an active member, in good standing, of the bar of the District of Columbia, that she maintains the regular practice of law at the below-noted address, and that she is not a resident of the State of Idaho or licensed to practice in Idaho.

An original *Certification* of her good standing with the District of Columbia Bar is attached hereto. Renée D. Flaherty certifies that she has not previously been admitted under Idaho State Bar Commission Rule 227.

Undersigned counsel certify that a copy of this Application has been served on all other parties to this matter and that a copy of the Application, accompanied by a \$325.00 fee, has been provided to the Idaho State Bar.

Counsel certify that the above information is true to the best of their knowledge, after reasonable investigation. Jason R. Mau acknowledges that his attendance shall be required at all court proceedings in which Renée D. Flaherty attends, unless specifically excused by the justices.

DATED this 30th day of September, 2025.

PARSONS BEHLE & LATIMER



Jason R. Mau

Attorneys for Parent Petitioners in Intervention

DATED this 30th day of September, 2025.

INSTITUTE FOR JUSTICE

/s/ Renée D. Flaherty

Renée D. Flaherty

Attorney for Parent Petitioners in Intervention

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 30th day of September, 2025, a true and correct copy of the foregoing document was filed with the Clerk of the Court using the iCourt Efile System which sent a Notice of Electronic Filing to the following persons, and I served a true and correct copy of the foregoing by delivering the same to each of the following individuals by the method indicated below, addressed as follows:

Marvin M. Smith, Marvin K. Smith, Craig L. Meadows, Brandon Helgeson, Jean Schroeder Hawley Troxell Ennis & Hawley llp 2010 Jennie Lee Drive Idaho Falls, ID 83404 <i>Attorneys for Petitioners</i>	<input type="checkbox"/> U.S. Mail <input type="checkbox"/> Facsimile: (208) 529-3065 <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Delivery <input checked="" type="checkbox"/> Email / iCourt: mmsmith@hawleytroxell.com ; mksmith@hawleytroxell.com ; cmeadows@hawleytroxell.com ; bhelgeson@hawleytroxell.com ; jschroeder@hawleytroxell.com
Raul R. Labrador, Attorney General Alan M. Hurst, Solicitor General James E.M. Craig, Chief Civil Litigation & Constitutional Defense Michael A. Zarian, Deputy Solicitor General Sean M. Corkery, Assistant Solicitor General OFFICE OF THE ATTORNEY GENERAL P. O. Box 83720 Boise, ID 83720-0010 <i>Attorneys for Respondent</i>	<input type="checkbox"/> U.S. Mail <input type="checkbox"/> Facsimile: <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Delivery <input checked="" type="checkbox"/> Email / iCourt: alan.hurst@ag.idaho.gov
Thomas M. Fisher, <i>pro hac vice pending</i> Bryan Cleveland, <i>pro hac vice pending</i> EDCHOICE LEGAL ADVOCATES 111 Monument Circle, Suite 2650 Indianapolis, IN 46204 <i>Attorneys for Parent Petitioners for Intervention</i>	<input type="checkbox"/> U.S. Mail <input type="checkbox"/> Facsimile: <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Delivery <input checked="" type="checkbox"/> Email / iCourt: tfisher@edchoice.org ; bcleveland@edchoice.org

Renée Flaherty, <i>pro hac vice pending</i> INSTITUTE FOR JUSTICE 901 N. Glebe Road, Suite 900 Arlington, VA 22203 <i>Attorneys for Parent Petitioners for Intervention</i>	<input type="checkbox"/> U.S. Mail <input type="checkbox"/> Facsimile: <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Delivery <input checked="" type="checkbox"/> Email / iCourt: rflaherty@ij.org
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Jason R. Mau

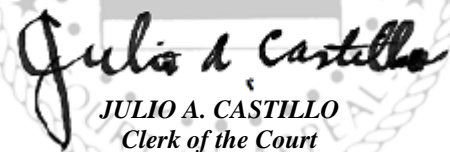


*On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals,
the District of Columbia Bar does hereby certify that*

Renee Denise Flaherty

*was duly qualified and admitted on December 10, 2012 as an attorney and counselor entitled to
practice before this Court; and is, on the date indicated below, an Active member in good
standing of this Bar.*

*In Testimony Whereof,
I have hereunto subscribed my
name and affixed the seal of this
Court at the City of
Washington, D.C., on August 14, 2025.*


JULIO A. CASTILLO
Clerk of the Court

Issued By:



*David Chu - Director, Membership
District of Columbia Bar Membership*

***For questions or concerns, please contact the D.C. Bar Membership Office at 202-626-3475 or email
memberservices@dcbar.org.***