

# The Supreme Court of South Carolina

DANIEL E. SHEAROUSE  
CLERK OF COURT

BRENDA F. SHEALY  
CHIEF DEPUTY CLERK

POST OFFICE BOX 11330  
COLUMBIA, SOUTH CAROLINA 29211

(803) 734-1080

FAX (803) 734-1499

February 8, 2012

D. Michael Kelly, Esquire  
Brad D. Hewett, Esquire  
Mike Kelly Law Group, LLC  
P.O. Box 8113  
Columbia, SC 29202

Re: Bartley, Freddie v. Ford Motor Co.

Dear Counsel:

The following Order has been endorsed on your Motion to Admit Dana G. Taunton Pro Hac Vice in the above entitled case on appeal.

“Granted.

Jean H. Toal C.J.,  
For the Court

By s/ Daniel E. Shearouse  
Clerk

February 8, 2012.”

Please be advised that by copy of this letter we are advising all interested parties of the action by the Court.

Very truly yours,

  
CLERK

Bartley, Freddie v. Ford Motor Co.  
Page Two  
February 8, 2012

DES/lda

cc: Dana G. Taunton, Esquire  
J. Kenneth Carter, Jr., Esquire  
Carmelo B. Sammataro, Esquire  
William J. Conroy, Esquire

**THE STATE OF SOUTH CAROLINA  
In The Supreme Court**

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**APPEAL FROM EDGEFIELD COUNTY  
Court of Common Pleas  
Case No.: 2005-CP-19-244**

**William P. Keesley  
Circuit Court Judge**

**RECEIVED**

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**Freddie Bartley, as Personal Representative  
of the Estate of Rachel Bartley,  
Petitioner**

**FEB 07 2012**

**S.C. Supreme Court**

**v.**

**Ford Motor Company, Inc.,  
Respondent**

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**MOTION TO ADMIT DANA G. TAUNTON PRO HAC VICE**

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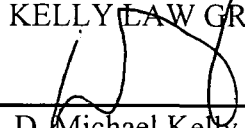
The undersigned, a member of the bar of this Court, hereby moves special admission of Dana G. Taunton for appearance as counsel of record in this case. This motion is based upon the showings contained in the declarations attached hereto.

The undersigned certifies that he has consulted with opposing counsel, who has no objection to this admission.

Respectfully Submitted,

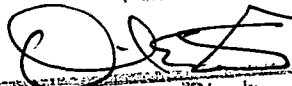
MIKE KELLY LAW GROUP, LLC

By:

  
\_\_\_\_\_  
D. Michael Kelly  
500 Taylor Street, 4<sup>th</sup> Floor  
Post Office Box 8113  
Columbia, SC 29201  
803-726-0123 office  
803-252-7145 fax

Columbia, South Carolina

February 6, 2012

GRANTED  
  
Jean H. Toal  
For the Court  
Clerk

February 8, 2012

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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APPEAL FROM EDGEFIELD COUNTY  
Court of Common Pleas  
Case No.: 2005-CP-19-244

William P. Keesley  
Circuit Court Judge

---

Freddie Bartley, as Personal Representative  
of the Estate of Rachel Bartley,  
Petitioner

v.

Ford Motor Company, Inc.,  
Respondent

---

RECEIVED

FEB 07 2012

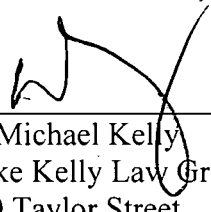
S.C. Supreme Court

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PROOF OF SERVICE

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I certify that I have served the Motion to Admit Dana Taunton Pro Hac Vice by depositing a copy of it in the United States Mail, postage prepaid, on February 6, 2012, addressed to its attorney of record, Carmelo B. Sammataro, Post Office Box 1473, Columbia, South Carolina 29202.

  
\_\_\_\_\_  
D. Michael Kelly  
Mike Kelly Law Group, LLC  
500 Taylor Street  
Post Office Box 8113  
Columbia, South Carolina 29202  
(803) 726-0123

February 7<sup>th</sup>, 2012

  
**MIKE KELLY**  
LAW GROUP, LLC

**Columbia Office**  
500 Taylor Street  
Columbia, SC 29201

**Mailing Address**  
PO Box 8113  
Columbia, SC 29202

Telephone 803.726.0123  
Toll-Free 866.692.0123  
Fax 803.252.7145

E-mail bhewett@mklawgroup.com

February 6, 2012

The Honorable Daniel E. Shearouse  
S.C. Supreme Court  
1231 Gervais Street  
P.O. Box 11330  
Columbia, SC 29211

**RECEIVED**

FEB 06 2012 *LA*

S.C. Supreme Court  
**RECEIVED**

FEB 07 2012

Re: Bartley v. Ford Motor Company

Dear Mr. Shearouse:

**S.C. Supreme Court**

Enclosed, please find a Motion to Admit Dana G. Taunton Pro Hac Vice, along with a \$25.00 filing fee check. Please file the original and return the extra-stamped copies with the courier.

Sincerely,

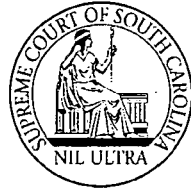


Brad D. Hewett  
Attorney at Law

BDH/tvm  
Enclosure  
cc: Carmelo B. Sammataro, Esq.

**OFFICES IN:**

Columbia, Myrtle Beach and Winnsboro, South Carolina  
www.mklawgroup.com



# The Supreme Court of South Carolina

DANIEL E. SHEAROUSE  
CLERK OF COURT

BRENDA F. SHEALY  
CHIEF DEPUTY CLERK

POST OFFICE BOX 11330  
COLUMBIA, SOUTH CAROLINA 29211  
TELEPHONE: (803) 734-1080  
FAX: (803) 734-0384

January 31, 2012

The Honorable Daniel E. Shearouse  
Clerk of Court  
South Carolina Supreme Court  
Post Office Box 11330  
Columbia, S.C. 29211

RE: Freddie Bartley as PR for the Estate of Rachel D. Bartley  
v. Ford Motor Company, Inc.,  
Case No.: 2011-20-4846

Dear Mr. Shearouse:

I certify that the Office of Bar Admissions has received a verified application requesting Dana G. Taunton be admitted *pro hac vice* in the above matter. The \$250 filing fee for the applicant has been paid.

Yours truly,

Deputy Clerk for Bar Admissions

GBW/st

**VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE*  
IN THE STATE OF SOUTH CAROLINA**

Freddie Bartley as PR for the Estate of  
Rachel D. Bartley

2011-204846

The Supeme Court of South  
Carolina

Plaintiff

Case No.

Court

vs.

Mailing Address of Court: P. O. Box 11330; Columbia, SC 29211

Ford Motor Company, Inc.

Defendant

**RECEIVED**

JAN 31 2012

**S.C. SUPREME COURT**

Comes now Dana G. Taunton, applicant herein, and respectfully represents the following:

1. Applicant resides at:

642 Larkin Lane

Street Address

Montgomery

City

(334) 213-2311

Telephone

Montgomery

County

Alabama

State

36109

Zip Code

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Beasley,

Allen, Crow, Methvin, Portis & Miles, P.C., with offices at, at

218 Commerce Street

Street Address

Montgomery

City

(334) 269 2343

Telephone

Montgomery

County

Alabama

State

36104

Zip Code

(334) 954 7555

Fax Number

3. Applicant has been retained personally or as a member of the above named law firm by Freddie Bartley to provide legal representation in connection with the above case now pending before the above named court of the State of South Carolina.

4. Since September of 1993, applicant has been, and presently is, a member in good standing of the bar of the highest court of the District of Columbia or the State of Alabama where applicant regularly practices law. Attached is a certificate of good standing.

5. Applicant has been admitted to practice before the following courts: (List all of the following courts applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.)

Court:

Date Admitted:

The Supreme Court of Alabama	September 1993
U.S. District Court for the Middle District of Alabama	March 1995
U.S. District Court for the Northern District of Alabama	December 2009
U.S. District Court for Western District of Tennessee	March 2006

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below:  
(List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

N/A

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court, date):

N/A

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

N/A

8. Applicant never has had any certificate or privilege to appear and practice before any administrative body suspended or revoked, except as provided below (give particulars, e.g., date, administrative body, date of suspension and reinstatement):

N/A

9. Local counsel of record associated with applicant in this case is D. Michael Kelly, of the Mike Kelly Law Group, LLC law firm, which has offices at:

500 Taylor Street

Street Address

Richland

County

(803) 726-0123

Telephone

Columbia

City

South Carolina

State

29201

Zip Code

If applicable list all other firms/attorneys you are associated with in this matter

N/A

10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

N/A

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant respectfully requests to be admitted to practice in the above named court for this case only.

DATED this 20th day of January, 2012.

Dana G. Taunton  
APPLICANT

**VERIFICATION**

STATE OF ALABAMA)

COUNTY OF MONTGOMERY)

I, DANA G. TAUNTON, do hereby swear or affirm under penalty of perjury that I am the applicant in the above styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true.

Dana G. Taunton  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 20<sup>th</sup> day of January, 2012.

Rosemary M. Mullin

Notary Public for the State of Alabama

My Commission Expires: 1/12/13

**LOCAL COUNSEL CONSENT**

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 31 day of JAN, 2012.

[Signature]  
LOCAL COUNSEL OF RECORD

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this 20<sup>th</sup> day of January, 2012.

Dana G. Taunton  
APPLICANT/AFFIANT

# The Supreme Court of Alabama



## Certificate Of Admission

I, Robert G. Esdale, as Clerk of the Supreme Court of Alabama, do hereby certify that Dana C. Gibson Taunton was duly and legally admitted to practice law by the Supreme Court of Alabama on September 24, 1993 and is now an attorney in good standing at the Bar of this Court, as shown by the records of said Court on file in this office.

I further certify that the Supreme Court of Alabama is the highest court of record in this State.

Done on January 19, 2012  
with the seal of the Supreme Court of Alabama attached.



*Robert G. Esdale*

Robert G. Esdale, Clerk  
Supreme Court of Alabama

# TURNER PADGET

TURNER PADGET GRAHAM & LANEY P.A.

CHARLESTON  
COLUMBIA  
FLORENCE  
GREENVILLE  
MYRTLE BEACH

REPLY TO:

**Carmelo B. Sammataro**

[SSammataro@TurnerPadget.com](mailto:SSammataro@TurnerPadget.com)

Writer's Direct Dial: (803) 227-4253

January 13, 2012

**VIA HAND DELIVERY**

The Honorable Daniel E. Shearouse  
Clerk, SC Supreme Court  
Supreme Court Building  
1231 Gervais Street  
Columbia, SC 29201

RECEIVED

JAN 13 2012

S.C. Supreme Court

Re: Freddie Bartley as PR for the Estate of Rachel D. Bartley v. Jim Satcher, Inc. and Ford Motor Company  
Case No.: 2005-CP-19-244  
Case Tracking No.: 2011-204846  
File No: 5100.211

Dear Mr. Shearouse:

Enclosed please find the original and seven copies of Return To Petition For Writ Of *Certiorari* Of Respondent Ford Motor Company regarding the above-referenced matter. Also enclosed are the original and one copy of the Proof Of Service. Please file the original filings and return clocked copies to me via our office courier. Thank you for your assistance with this matter, and please contact me if you have any questions.

With kind regards, I am

Very truly yours,

TURNER, PADGET, GRAHAM & LANEY, P.A.

  
Carmelo B. Sammataro

CBS/tj

Enclosures

cc: D. Michael Kelly, Esquire  
Brad D. Hewett, Esquire  
(w/enc.)

BUSINESS • LITIGATION • SOLUTIONS

Bank of America Plaza • 17th Floor • 1901 Main Street (29201) • PO Box 1473 • Columbia, SC 29202

Phone (803) 254-2200 • Fax (803) 799-3957 • [turnerpadget.com](http://turnerpadget.com)



# The Supreme Court of South Carolina

DANIEL E. SHEAROUSE  
CLERK OF COURT

BRENDA F. SHEALY  
CHIEF DEPUTY CLERK

POST OFFICE BOX 11330  
COLUMBIA, SOUTH CAROLINA 29211

(803) 734-1080

FAX (803) 734-1499

December 19, 2011

D. Michael Kelly, Esquire  
Brad D. Hewett, Esquire  
Mike Kelly Law Group, LLC  
P.O. Box 8113  
Columbia, SC 29202

Re: Bartley, Freddie v. Ford Motor Co.

Dear Counsel:

This office has received the Petition for Writ of Certiorari and Appendix in the above entitled matter. It reflects that R. Graham Esdale, Jr., Esquire and J. Cole Portis, Esquire are counsel of record for the Petitioner in this matter. Since they are not admitted to practice law in South Carolina, they must be admitted pro hac vice by this Court before they may make an appearance in this matter, Rule 404, SCACR.

If you desire for them to appear as counsel in this matter, you will need to associate them and must make a motion to have them admitted pro hac vice. The motion should comply with the requirements of Rule 224, SCACR, to include a filing fee of \$25.00. Additionally, the motion should be accompanied by an original and a copy of the completed application form required by Rule 404, to include the \$250.00 filing fee per person and any required attachments. This office will insure that copies of the application form and the filing fee are provided to the Office of Bar Admissions.

The motion should be filed in this office and served on opposing counsel within thirty days of the date of this letter.

Bartley, Freddie v. Ford Motor Co.  
Page Two  
December 19, 2011

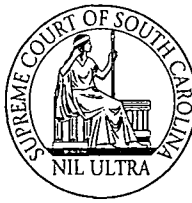
Very truly yours,



CLERK

DES/lda

cc: J. Cole Portis, Esquire  
R. Graham Esdale, Esquire  
J. Kenneth Carter, Jr., Esquire  
Carmelo B. Sammataro, Esquire  
William J. Conroy, Esquire  
The Honorable Tanya Gee



# The Supreme Court of South Carolina

DANIEL E. SHEAROUSE  
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POST OFFICE BOX 11330  
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December 19, 2011

D. Michael Kelly, Esquire  
Brad D. Hewett, Esquire  
Mike Kelly Law Group, LLC  
P.O. Box 8113  
Columbia, SC 29202

Re: Bartley, Freddie v. Ford Motor Co.  
Case Tracking No. 2011-204846

Dear Counsel:

This office has received your Petition for Writ of Certiorari and Appendix in the above matter. It has been assigned the Case Tracking Number that appears above. Please use this number on all future correspondence relating to this matter.

I do wish to call the attention of the parties to the attached order relating to the inclusion of personal data identifiers and other sensitive information in documents filed with the Supreme Court of South Carolina and the South Carolina Court of Appeals. Please note that the responsibility for insuring that information is redacted or sealed as required by this order rests with counsel and the parties. This office will not review filings for redaction or to determine if materials should be sealed.

Very truly yours,



CLERK

DES/lda

Enclosure

cc: J. Cole Portis, Esquire  
R. Graham Esdale, Esquire  
J. Kenneth Carter, Jr., Esquire  
Carmelo B. Sammataro, Esquire  
William J. Conroy, Esquire  
The Honorable Tanya Gee

*MIKE KELLY*  
MIKE KELLY  
LAW GROUP, LLC

**Columbia Office**  
500 Taylor Street  
Columbia, SC 29201

**Mailing Address**  
PO Box 8113  
Columbia, SC 29202

Telephone 803.726.0123  
Toll-Free 866.692.0123  
Fax 803.252.7145  
E-mail bhewett@mklawgroup.com

December 16, 2011

The Honorable Daniel E. Shearouse  
S.C. Supreme Court  
1231 Gervais Street  
P.O. Box 11330  
Columbia, SC 29211

**RECEIVED**

DEC 16 2011

**S.C. Supreme Court**

Re: Bartley v. Ford Motor Company

Dear Mr. Shearouse:

Enclosed, please find the following: Petition for a Writ of Certiorari with Proof of Service and Appendix, along with \$100 filing fee. Please file and return the extra-stamped copies. By copy of this letter, I am providing a copy of the above-mentioned documents via U.S. Mail to Kenneth Carter/Carmelo B. Sammataro, counsel of record for the respondent.

If you have any questions or concerns, please do not hesitate to contact this office.

Sincerely,

*Brad D. Hewett*

Brad D. Hewett  
Attorney

*Janya*

BDH/tvm  
Enclosures  
Kenneth Carter/Carmelo Sammataro, Esq. (w/o Appendix)

*Check #0014527  
\$100.00*

**OFFICES IN:**

Columbia, Myrtle Beach and Winnsboro, South Carolina  
www.mklawgroup.com