

IN THE STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

William H. Seals, Jr., Circuit Court Judge

Appellate Case No. 2023-000063

RECEIVED

FEB 13 2023

SC Court of Appeals

Steven Michael Okun, as Personal Representative
of the Estate of Jane Luanne Okun.....Respondent,

v.

Pobuckra Properties, LLC and Alliance Commercial
Property Management, Inc. Appellants.

MOTION IN SUPPORT OF PRO HAC VICE APPLICATION

M. Dawes Cooke, Jr., counsel for Appellants Pobuckra Properties, LLC and Alliance Commercial Property Management, Inc., and a member in good standing of the bar of the South Carolina Supreme Court admitted to practice before this Court hereby moves in the above-captioned appellate case for the admission and appearance of Agelo L. Reppas of BatesCarey, LLP, an attorney who is a member in good standing of the bar of the highest court of the State of Illinois where she regularly practices law. This motion is made upon and is supported by the Verified Application for Admission Pro Hac Vice in the State of South Carolina of Agelo L. Reppas, which was sent to the South Carolina Supreme Court Office of Bar Admissions on January 31, 2023, along with the \$250.00 filing fee pursuant to Rule 404, SCACR (Exhibit A) and Agelo L. Reppas' supplement to her Verified Application for Admission Pro Hac Vice in the State of

South Carolina with a letter of good standing of the bar of the highest court of the State of Illinois, which was subsequently sent to the South Carolina Supreme Court Office of Bar Admissions on February 3, 2023 (Exhibit B).

As local counsel, I agree that I shall at all times be prepared to go forward with the case, sign all papers subsequently filed, and attend all subsequent proceedings in the matter, unless the tribunal specifically excuses me from attendance. I further agree that service of all pleadings and notices as required shall be sufficient if served upon me, and it is my responsibility to serve my associate counsel admitted pro hac vice.

The undersigned local counsel hereby moves, with the attached Verified Application for Admission Pro Hac Vice in the State of South Carolina and supplement to the Verified Application for Admission Pro Hac Vice, that Agelo L. Reppas be admitted pro hac vice in the above-captioned case in the South Carolina Court of Appeals.

Barnwell Whaley Patterson & Helms, LLC

s/M. Dawes Cooke, Jr.

M. Dawes Cooke, Jr. (S.C. Bar No. 1376)

D. Summers Clarke, II (S.C. Bar No. 74829)

P.O. Drawer H

Charleston, SC 29402

mdc@barnwell-whaley.com

sclarke@barnwell-whaley.com

Counsel for Appellants Pobuckra Properties, LLC and Alliance Commercial Property Management, Inc.

February 7, 2023

Charleston, South Carolina

Other Counsel of Record:

Gene M. Connell, Jr.
Kelaher, Connell & Connor, P.C.
P. O. Drawer 14547
Surfside Beach, South Carolina 29587-4547
gconnell@classactlaw.net
(843) 238-5648

***Counsel for Respondent Steven Michael Okun, as
Personal Representative of the Estate of Jane Luanne Okun***



BATESCAREY^{LLP}

EXHIBIT
A

January 31, 2023

VIA FEDERAL EXPRESS

South Carolina Supreme Court
Office of Bar Admissions
PO Box 11330
Columbia, SC 29211

Re: Matter: Okun v. Pobuckra Properties, LLC

Dear Admissions:

Enclosed please find the pro hac vice application and admission fees (\$250.00 each) for Agelo L. Reppas and Colleen P. Sorensen for the case Okun v. Pobuckra Properties, LLC., Case No. 2023-000063.

Yours truly,

A handwritten signature in black ink that reads "Maricela Martinez". The signature is written in a cursive style with a large initial 'M' and a long, sweeping underline.

Maricela Martinez

3126964

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

Steve Michael Okun, Personal
Representative of the Estate of Jane
Luanne Okun
Plaintiff

2023-000063
Case No.

South Carolina Court of Appeals
Tribunal

vs.

Mailing Address of Tribunal: P.O. Box 11629
Columbia, SC 29211

Pobuckra Properties, LLC and
Alliance Commercial Property
Management, Inc.
Defendant

Comes now Agelo L. Reppas, applicant herein, and respectfully represents the following:

1. Applicant resides at:
2308 W. Erie St.
Street Address
Chicago Cook Illinois 60612
City County State Zip Code
(312) 762-3286
Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of)
BatesCarey, LLP, with offices at
191 N. Wacker Drive, Suite 2400
Street Address
Chicago Cook Illinois 60606
City County State Zip Code
(312) 762-3286 (773) 943-9799 (312) 762-3200 areppas@batescarey.com
Primary Telephone Cell Phone Fax Number Email Address

3. Applicant has been retained personally or as a member of the above-named law firm by
Pobuckra Properties, LLC and Alliance Commercial Property
Management, Inc. to provide legal representation in
connection with the above case now pending before the above-named tribunal of the State of South Carolina.

4. Since November of 2000, 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
Illinois where applicant regularly practices law. Attached is a certificate of good
standing dated within the last 90 days from the bar of the highest court of the District of Columbia or the State
where applicant regularly practices law.

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:
Illinois	11/09/2000
United States District Court for the Northern District of Illinois	12/21/2000
United States Court of Appeals for the Second Circuit	07/20/2010
United States Court of Appeals for the Third Circuit	03/12/2010
United States Court of Appeals for the Fourth Circuit	08/31/2018
United States Court of Appeals for the Fifth Circuit	10/22/2002
United States Court of Appeals for the Sixth Circuit	01/05/2007
United States Court of Appeals for the Seventh Circuit	11/30/2001
United States Court of Appeals for the Eighth Circuit	12/01/2014
United States Court of Appeals for the Ninth Circuit	04/23/2007
United States Court of Appeals for the Tenth Circuit	01/20/2011
United States Court of Appeals for the Eleventh Circuit	08/31/2004
New York	09/21/2006

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 court or administrative body suspended or revoked, except as provided below (give particulars, e.g., date, court, administrative body, date of suspension and reinstatement):

n/a

9. Local counsel of record associated with applicant in this case is M. Dawes Cooke, Jr. of the Barnwell Whaley Patterson & Helms, LLC law firm, which has offices at:

P.O. Drawer H
 Street Address
Charleston Charleston SC 29402
 City County State Zip Code
(843) 577-7700 (843) 729-2545 (843) 577-7708 mdc@barnwell-
 Primary Telephone Cell Phone Fax Number Email Address
whaley.com

1376

South Carolina Bar Number

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 tribunal for this case only.

DATED this 31st day of January, 20 23


APPLICANT

VERIFICATION

STATE OF ILLINOIS)

COUNTY OF COOK)

I, Agela K. Reppas, 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. I understand that I am under a continuing duty to promptly update the information provided in the application until the tribunal has ruled on the motion for admission pro hac vice. Further, if the motion is granted, I understand that I am under a continuing duty to promptly update the information provided in the application as long as I continue to appear pro hac vice in the action or proceeding. Any updated information shall be provided to both the tribunal that granted the motion and to the tribunal in which the action or proceeding may then be pending.

Agela K. Reppas
APPLICANT/AFFIANT

Subscribed and sworn to before me this 31st day of January, 20 23
Maricela Martinez

Notary Public for the State of Illinois
My Commission Expires: 2/26/2026



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 31st day of January, 20 23
Maricela Martinez
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

31st day of January, 20 23
Agela K. Reppas
APPLICANT/AFFIANT

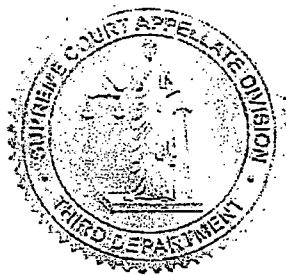


*Appellate Division of the Supreme Court
of the State of New York
Third Judicial Department*

*I, Robert D. Mayberger, Clerk of the Appellate Division of
the Supreme Court of the State of New York, Third Judicial
Department, do hereby certify that*

Agelo Larena Reppas

*was duly licensed and admitted to practice as an Attorney and
Counselor at Law in all the courts of this State on September 21,
2006, has duly taken and subscribed the oath of office prescribed
by law, has been enrolled in the Roll of Attorneys and Counselors
at Law on file in this office, is duly registered with the
Administration Office of the Courts, and according to the records
of this Court is currently in good standing as an Attorney and
Counselor-at-Law.*



*In Witness Whereof, I have hereunto set
my hand in the City of Albany on
January 18, 2023.*

Robert D Mayberger

Clerk of the Court



BATESCAREYLLP

Colleen P. Sorensen
312.762.3249 Direct
csorensen@batescarey.com

February 3, 2023

VIA USPS EXPRESS MAIL

South Carolina Supreme Court
Office of Bar Admissions
PO Box 11330
Columbia, SC 29211

**EXHIBIT
B**

**Re: Matter: Okun v. Pobuckra Properties, LLC
Case No.: 2023-000063**

Dear Admissions:

Enclosed please find a letter of good standing from Illinois for Agelo L. Reppas. The enclosed supplements her pro hac vice application sent January 31, 2023, which included a certificate of good standing from New York.

Yours truly,

Colleen P. Sorensen



Attorney Registration and Disciplinary Commission
of the
Supreme Court of Illinois
www.iardc.org

One Prudential Plaza
130 East Randolph Drive, Suite
1500
Chicago, IL 60601-6219
(312) 565-2600 (800) 826-8625
Fax (312) 565-2320

3161 West White Oaks Drive
Suite 301
Springfield, IL 62704
(217) 522-6838 (800) 232-8048
Fax (217) 522-2417

Chicago
2/3/2023

Re: Agelo Larena Reppas
Attorney No. 6272923

To Whom It May Concern:

The records of the Clerk of the Supreme Court of Illinois and this office reflect that Agelo Larena Reppas was admitted to practice law in Illinois on 11/9/2000; is currently registered on the master roll of attorneys entitled to practice law in this state; has never been disciplined and is in good standing.

Very truly yours,
Jerome Larkin
Administrator

By: 
Andrew Oliva
Registrar

IN THE STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

William H. Seals, Jr., Circuit Court Judge

Appellate Case No. 2023-000063

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SC Court of Appeals

Steven Michael Okun, as Personal Representative
of the Estate of Jane Luanne Okun.....Respondent,

v.

Pobuckra Properties, LLC and Alliance Commercial
Property Management, Inc. Appellants.

PROOF OF SERVICE

I certify that I have served the Motion in Support of the Pro Hac Vice Application of Agelo L. Reppas on Respondent Steven Michael Okun, as Personal Representative of the Estate of Jane Luanne Okun by depositing a copy of it in the United States Mail, postage prepaid, on February 8, 2023, addressed to Respondent's counsel of record, Gene M. Connell, Jr., Esq., P.O. Drawer 14547, Surfside Beach, SC 29587-4547.

Barnwell Whaley Patterson & Helms, LLC



Janet Segell, Legal Assistant to
M. Dawes Cooke, Jr. (S.C. Bar No. 1376)

February 8, 2023
Charleston, South Carolina

EST. 1938

BARNWELL WHALEY

ATTORNEYS AT LAW

M. DAWES COOKE, JR.
MEMBER ATTORNEY
MDC@BARNWELL-WHALEY.COM

February 8, 2023

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SC Court of Appeals

2026.211

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

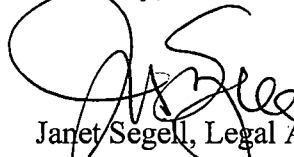
Re: *Steven Michael Okun, as Personal Representative of the Estate of Jane Luanne Okun vs. Pobuckra Properties, LLC and Alliance Commercial Property Management, Inc.*
Appellate Case No. 2023-000063

Dear Ms. Kitchings:

Pursuant to my email of yesterday, a copy of which is enclosed for your reference, please find the correct Motion for Admission Pro Hac Vice for Attorney Agelo Reppas. We would greatly appreciate your substituting this version for the one that was erroneously mailed yesterday. The \$50 filing fee was included in yesterday's mailing.

Again, I apologize for the confusion. If you have any questions, please do not hesitate to contact me.

Sincerely,



Janet Segell, Legal Assistant to
M. Dawes Cooke, Jr.

/jas
enclosures

c: Gene M. Connell, Jr., Esq.

{01235635.DOCX.1}

BARNWELL WHALEY PATTERSON & HELMS LLC

211 KING STREET, SUITE 300
CHARLESTON, SC 29401
843.577.7700

720 NO. 3RD STREET, SUITE 102
WILMINGTON, NC 28401
910.679.1388

BARNWELL-WHALEY.COM

Janet Segell

From: Janet Segell
Sent: Tuesday, February 7, 2023 5:16 PM
To: ctappfilings@sccourts.org
Cc: D. Summers Clarke, II; Susan B. Hatch; 'gconnell@classactlaw.net'; Barbara Smith
Subject: Okun v. Pobuckra, et al.
Attachments: Reppas - Mtn Pro Hac Vice 2.7.2023 (01235030xA18B7).PDF

I must apologize. I sent you a draft of the pro hac vice motion for the admission of Agela Reppas that was missing Exhibit B. Attached is the correct one. I am sorry for the confusion. I will also send the correct one in the mail.

JANET SEGELL

LEGAL ASSISTANT TO K. MICHAEL BARFIELD, D. SUMMERS CLARKE, II, ALLIE M. BURNS, and G. HUDSON WORTHY



JSEGELL@BARNWELL-WHALEY.COM

[843-577-7700](tel:843-577-7700)

[843-329-5325 \(dir.\)](tel:843-329-5325)

BARNWELL-WHALEY.COM

BARNWELL WHALEY PATTERSON & HELMS LLC
211 KING STREET, SUITE 300
CHARLESTON, SC 29401

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PO DRAWER 41 CHARLESTON, SC 29402

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The Honorable Jenny Abbott Kitchings
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Columbia, SC 29211

