

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

---

**RECEIVED**

**Feb 21 2023**

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas  
The Honorable Grace Gilchrist Knie, Circuit Court Judge

---

S.C. SUPREME COURT

Appellate Case No. 2022-000079

---

Phillip Francis Luke Hughes, on behalf of the Estate of Jane K. Hughes,  
Petitioner,

v.

Bank of America, National Association,  
Respondent.

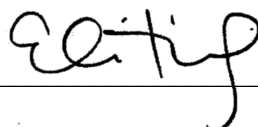
---

**PROOF OF SERVICE**

---

I certify that I have served a copy of the foregoing Motion for Admission *Pro Hac Vice* of Kathryn M. Barber upon counsel in this action by e-mailing and mailing a copy thereof, to Bradley D. Hewett and D. Michael Kelly of Mike Kelly Law Group, LLC located at 1523 Huger Street, Suite A, Columbia, South Carolina 29201.

Dated: February 21, 2023



---

Robert A. Muckenfuss  
(S.C. Bar No. 13903)  
MCGUIREWOODS LLP  
201 N. Tryon Street, Suite 3000  
Charlotte, NC 28202  
Telephone: (704) 343-2052  
Fax: (704) 444-8707  
RMuckenfuss@mcguirewoods.com

Elizabeth Z. Timmermans  
(S.C. Bar No. 100288)  
MCGUIREWOODS LLP  
501 Fayetteville Street, Suite 500  
Raleigh, NC 27601  
Telephone: (919) 755-6576  
Fax: (919) 755-6595  
EZTimmermans@mcguirewoods.com

*Attorneys for Respondent*