

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

Moss Creek Owners Association, Inc. Plaintiff vs. AEI Resources, Inc. Defendant
2021-CP-07-00526 Case No.
Court of Common Pleas Tribunal
Mailing Address of Tribunal: PO Drawer 1228 Beaufort, SC 29901-1228

Comes now Bruce A. Issadore, Esq., applicant herein, and respectfully represents the following:

1. Applicant resides at: 6 Heron Way
Street Address
Hingham Plymouth MA 02043
City County State Zip Code
617 755 0599
Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Issadore Law LLC, with offices at 17 Accord Park Dr., Suite 100
Street Address
Norwell Plymouth MA 02061
City County State Zip Code
781 878 9981 617 755 0599 781 878 6670 b.issadore@issadorelaw.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 AEI Resources LLC 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 December of 1981, 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 Massachusetts 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.)

Table with 2 columns: Court, Date Admitted. Row 1: United States District Court for MA, 1981

Court:	Date Admitted:
Supreme Judicial Court of MA	1981
Court of Appeals - MA	1981
Superior and District Courts - MA	1981
Land Court - MA	1981
Probate and Family Court - MA	1981

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 Brandon W. Smith, Esq. of the Smith Law, LLC law firm, which has offices at:

200 Okatie Village Drive  
 Street Address  
Bluffton Beaufort SC 29909  
 City County State Zip Code  
843 705 4400 843 321 1200 843 705 4401 bsmith@smithlawllc.com  
 Primary Telephone Cell Phone Fax Number Email Address  
70772  
 South Carolina Bar Number

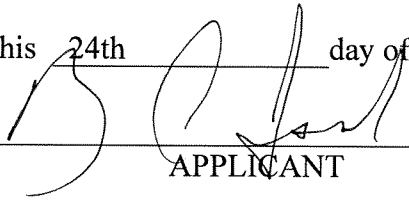
10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

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 24th day of February, 2023

  
\_\_\_\_\_  
APPLICANT

**VERIFICATION**

STATE OF FLORIDA )

COUNTY OF SARASOTA )

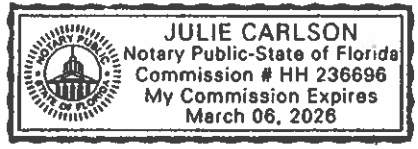
I, BRUCE A. ISSADORE, do hereby swear or affirm under penalty of perjury that I am the applicant in the above-styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and 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.

[Signature]  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 24<sup>th</sup> day of February, 20 23

[Signature]

Notary Public for the State of Florida  
My Commission Expires: 3/6/26



**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 24 day of February, 20 23

[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 8<sup>th</sup> day of February ~~March~~, 20 23

Bruce A. Issadore  
APPLICANT/AFFIANT



The Commonwealth of Massachusetts

SUPREME JUDICIAL COURT

FOR SUFFOLK COUNTY

JOHN ADAMS COURTHOUSE

ONE PEMBERTON SQUARE, SUITE 1300

BOSTON, MASSACHUSETTS 02108-1707

WWW.SJCCOUNTYCLERK.COM

MAURA S. DOYLE

CLERK

CASE INFORMATION (617) 557-1100

FACSIMILE (617) 557-1117

ATTORNEY SERVICES (617) 557-1050

FACSIMILE (617) 557-1055

November 16, 2022

Attorney Bruce A. Issadore  
Bruce A. Issadore, Esq.  
17 Accord Park Dr. Suite 100  
Norwell, MA 02061  
b.issadore@issadorelaw.com

**IN RE: CERTIFICATE OF ADMISSION AND GOOD STANDING**

Enclosed please find the Certificate of Admission and Good Standing for Commonwealth of Massachusetts Attorney **Bruce A. Issadore**. The certificate provides certification of the attorney's date of admission and current good standing at the Bar of the Commonwealth of Massachusetts.

If you have any questions or should need further assistance, please do not hesitate to contact the Attorney Services Department at either [sjccertsgs@sjc.state.ma.us](mailto:sjccertsgs@sjc.state.ma.us) or 617-557-1050.

Very truly yours,

A handwritten signature in black ink that reads "Maura S. Doyle".

MAURA S. DOYLE  
Clerk  
Supreme Judicial Court

MSD/ jr

Clearance: 11/16/2022 11.10.2022

Enclosures

# COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston within and for said County of Suffolk, on **December 16, 1981**, said Court being the highest Court of Record in said Commonwealth:

**Bruce A. Issadore**

being found duly qualified in that behalf, and having taken and subscribed the oaths required by law, was admitted to practice as an Attorney, and, by virtue thereof, as a Counsellor at Law, in any of the Courts of the said Commonwealth: that said Attorney is at present a member of the Bar, and is in good standing according to the records of this Court\*.

In testimony whereof, I have hereunto set my hand and affixed the

seal of said Court, this **sixteenth** day of **November**

in the year of our Lord **two thousand and twenty-two**.



A handwritten signature in blue ink that reads "Maura S. Doyle". The signature is written in a cursive style and is positioned above a horizontal dotted line.

MAURA S. DOYLE, Clerk

\* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification. X3116.