

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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APPEAL FROM RICHLAND COUNTY
COURT OF COMMON PLEAS

S.C. Supreme Court

The Honorable John Hamilton Smith, Special Referee

Case No. 2010-CP-40-8943R

COLUMBIA VENTURE, LLC,.....APPELLANT,

v.

RICHLAND COUNTY,.....RESPONDENT.

MOTION TO ADMIT JOHN D. ECHEVERRIA *PRO HAC VICE*

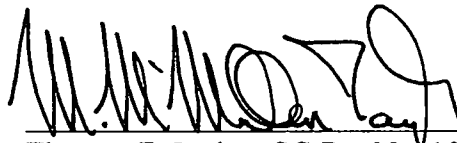
Respondent Richland County hereby moves to admit **John D. Echeverria** *pro hac vice* to participate in the briefing of the above captioned matter. John D. Echeverria is a Professor of Law at the Vermont Law School with nationally-recognized expertise on the legal theories raised in this matter. A copy of Mr. Echeverria's Verified Application for Admission *Pro Hac Vice*, served upon this Court on July 2, 2013, is attached as Exhibit A. He is a member in good standing of the District of Columbia Court of Appeals and agrees to be bound by the applicable South Carolina Rules Governing the Practice of Law.

Ms. M. McMullen Taylor, counsel for Respondent Richland County, is admitted to practice in the State of South Carolina, is a member in good standing of the South Carolina Bar, and will continue to represent Respondent in this matter as counsel of record, along with Thomas E. Lydon and Pope D. Johnson.

Mr. Echeverria's address for the purpose of receipt of service of motions, briefs, orders,
and other papers is as follows:

John D. Echeverria, Esquire
Vermont School of Law
164 Chelsea Street
Post Office Box 96
South Royalton, Vermont 05068
jecheverria@vermontlaw.edu

Respectfully submitted,



Thomas E. Lydon, SC Bar No. 10242
M. McMullen Taylor, SC Bar No. 72848
McAngus Goudelock & Courie, LLC
Post Office Box 12519
Columbia, South Carolina 29211-2519
(803) 779-2300
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mullen.taylor@mgclaw.com

Pope D. Johnson, III, SC Bar No. 3048
Johnson & Barnette, LLP
Post Office Drawer 11209
Columbia, South Carolina 29211-1209
(803) 799-9791
(803) 253-6084 (fax)
pdjohnson@johnsonbarnette.com

Counsel for Respondent Richland County

July 3, 2013

EXHIBIT A

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 Mullen Taylor and Thomas E. Lydon, of the McAngus Goudelock & Courie law firm, which has offices at:

1320 Main Street, 10th Floor

Street Address

Richland

County

803-779-2300

Telephone

Columbia

City

SC

State

29201

Zip Code

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

Pope D. Johnson, III

Johnson & Barnette, LLP

Post Office Box 11209

Columbia, SC 29211

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).

McQueen v. South Carolina Coastal Council; case is closed; application was filed by Leslie W. Stidham and the application was granted

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 27th day of June, 2013.

John D. Echeverria
APPLICANT

VERIFICATION

STATE OF Vermont)

COUNTY OF Windsor)

I, John Echeverria, 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.

John D. Echeverria
APPLICANT/AFFIANT

Subscribed and sworn to before me this 27th day of June, 20 13.

[Signature]

Monica Litzelman
Notary Public, State of
Vermont
Comm. Expires Feb. 10, 2015

Notary Public for the State of Vermont

My Commission Expires: 02-10-15

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.

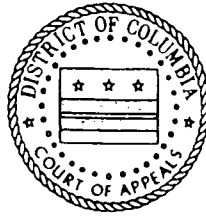
DATED this 2nd day of July, 2013.

[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~~ ^{hand deliver} 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 2 day of July, 2013.

[Signature]
APPLICANT/AFFIANT
Local Counsel of Record



District of Columbia Court of Appeals
Committee on Admissions
430 F Street, N.W. — Room 123
Washington, D. C. 20001
202 / 879-2710

I, JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, do hereby certify that

JOHN D. ECHEVERRIA

was on DECEMBER 13, 1982, duly qualified and admitted 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 **June 5, 2013***

JULIO A. CASTILLO
Clerk of the Court

By: *Brenda Hancock*
Deputy Clerk

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v.

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PROOF OF SERVICE

I certify that I have served Respondent Richland County's Motion to Admit John D. Echeverria *Pro Hac Vice* by depositing a copy of it in the United States Mail, postage prepaid, on the 3rd day of July, 2013, addressed to counsel of record, as follows:

Manton M. Grier, Esquire
Haynsworth Sinkler Boyd, P.A.
1201 Main Street, Suite 2200
Columbia, South Carolina 29201

James Y. Becker, Esquire
Haynsworth Sinkler Boyd, P.A.
1201 Main Street, Suite 2200
Columbia, South Carolina 29201

Elizabeth H. Black, Esquire
Haynsworth Sinkler Boyd, P.A.
1201 Main Street
Suite 2200
Columbia, South Carolina 29201

Rebekka S. Ridgely

Rebekka S. Ridgely

Paralegal to M. McMullen Taylor

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