

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

Appellate Case No. 2023-001601

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APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

Diane Goodstein, Circuit Court Judge

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Case No. 2018-CP-18-00729  
Appellate Case No. 2020-000935

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Portfolio Recovery Associates, LLC Assignee of  
Synchrony Bank/HH Gregg, Petitioner,

v.

Jennifer Campney, Respondent

and

Jennifer Campney, Third-party Plaintiff,

v.

Cooling & Winter, LLC, Third-party Defendant,  
of whom Jennifer Campney is the Respondent.

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**MOTION FOR ADMISSION PRO HAC VICE**

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**NOW COMES** J. Christina Boardman Kuklinski of Balch & Bingham LLP, pursuant to Rule 404, SCACR, and hereby moves this Court for an order granting Jason B. Tompkins of Balch & Bingham LLP admission *pro hac vice* in the above-styled case only for the purpose of appearing as counsel on behalf of ACA International, who intends to submit a Motion to Appear as Amicus Curiae. In support of this motion the undersigned states as follows:


1. The Verified Application for Admission *Pro Hac Vice* in the State of South Carolina of Jason B. Tompkins, as required by Rule 404(d), SCACR, is attached hereto as **Exhibit A**.

2. A check in the amount of \$250.00 in payment of filing fees required to process this motion for admission *pro hac vice* is being simultaneously delivered to the Clerk of this Court.

WHEREFORE, the undersigned counsel respectfully requests that this Court enter an order granting Jason B. Tompkins admission *pro hac vice* in the above-styled case.

November 14, 2023

Respectfully submitted,



J. Christina Boardman Kuklinksi

SC Bar No. 104395

BALCH & BINGHAM LLP

1901 Sixth Avenue North, Suite 1500

Birmingham, AL 35203

Telephone: 205.226.3408

Email: [ckuklinksi@balch.com](mailto:ckuklinksi@balch.com)

*Attorney for ACA International*

THE STATE OF SOUTH CAROLINA  
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v.

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and

Jennifer Campney, Third-party Plaintiff,

v.

Cooling & Winter, LLC, Third-party Defendant,  
of whom Jennifer Campney is the Respondent.

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**CERTIFICATE OF SERVICE**

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I certify that I have on this day served a copy of the foregoing **MOTION FOR ADMISSION PRO HAC VICE** upon all parties to this action by remitting copies of the same into sealed envelopes entrusted to the care and custody of the United States Postal Service for mailing via first-class mail, postage prepaid, with each envelope properly addressed as follows:

Caren D. Enloe  
Smith Debnam Narron Drake Saintsing & Myers, LLP  
4601 Six Forks Road, Suite 400  
Raleigh, NC 27609

J. Ronald Jones, Jr.  
Smith Debnam Narron Drake Saintsing & Myers, LLP  
171 Church Street, Suite 120C  
Charleston, SC 29401

*Attorneys for Petitioner*

John R. Cantrell, Jr.  
Cantrell Legal, PC  
P.O. Box 1276  
Goose Creek, SC 29445-1276

*Attorney for Respondent*

Joseph E. Brown  
S. Louis Schiappa  
Cooling & Winter, LLC  
220 N. Main Street, Suite 500  
Greenville, SC 29601

*Attorneys for Cooling & Winter, LLC*

Carolyn Grube Lybarker  
Kelly H. Rainsford  
P.O. Box 5757  
Columbia, SC 29250-5757

*Attorneys for South Carolina Department of Consumer Affairs*

Dated this the 14th day of November, 2023

  
\_\_\_\_\_  
J. Christina Boardman Kuklinks  
SC Bar No. 104395  
BALCH & BINGHAM LLP  
1901 Sixth Avenue North, Suite 1500  
Birmingham, AL 35203  
Telephone: 205.226.3408  
Email: [ckuklinks@balch.com](mailto:ckuklinks@balch.com)

*Attorney for ACA International*

# Exhibit A

#718

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

Please type your answers in the space provided. Provide an answer for every question asked. In your own handwriting, sign in all spaces where a signature is required (no e-signatures). The accompanying certificate of good standing should not be older than 90 days at the time of the filing of this application.

Portfolio Recovery Associates, LLC, et al. 2023-001601 Supreme Court  
Plaintiff Case No. Tribunal  
vs.  
Jennifer Campney  
Defendant

Mailing Address of Tribunal:

RECEIVED  
NOV 15 2023  
S.C. SUPREME COURT

Comes now Jason B. Tompkins, applicant herein, and respectfully represents the following:

1. Applicant resides at:  
488 Heatherwood Drive  
Street Address  
Birmingham Shelby Alabama 35244  
City County State Zip Code  
205-834-4771  
Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of)  
Balch & Bingham LLP, with offices at  
1901 Sixth Avenue North, Ste. 1500  
Street Address  
Birmingham Jefferson Alabama 35203  
City County State Zip Code  
205-226-8743 205-834-4771 205-488-5721 jtompkins@balch.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  
ACA International 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 2007 of April 27, 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 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. It is not necessary to provide a certificate of good standing from all courts  
before which you are admitted.

5. List all courts before which Applicant has been admitted to practice law, including United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and state courts or the District of Columbia.

| Court:        | Date Admitted: |
|---------------|----------------|
| See attached. |                |
|               |                |
|               |                |
|               |                |
|               |                |
|               |                |
|               |                |

Is Applicant presently a member in good standing of the bars of those courts listed above? List any court named in the preceding paragraph that applicant is no longer admitted to practice before.

Yes.>

6. Is Applicant presently subject to any suspension or disbarment proceedings, or has Applicant been formally notified of any complaints pending before a disciplinary agency? If yes, give particulars, e.g., jurisdiction, court date.

No.

7. Has Applicant had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked? If yes give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation.

No.

8. Has Applicant had any certificate or privilege to appear and practice before any court or administrative body suspended or revoked? If yes, give particulars, e.g., date, court, administrative body, date of suspension and reinstatement.

No.

9. Please be aware that local counsel must be Rule 403 certified. Local counsel of record associated

with Applicant in this case is J. Christina Boardman Kuklinksj of the Balch & Bingham LLP

law firm, which has offices at:

1901 Sixth Avenue North, Suite 1500

|                   |              |              |                      |
|-------------------|--------------|--------------|----------------------|
| Street Address    | Jefferson    | Alabama      | 35203                |
| Birmingham        | County       | State        | Zip Code             |
| 205-226-3408      | 205-901-5767 | 205-488-5668 | ckuklinski@balch.com |
| Primary Telephone | Cell Phone   | Fax Number   | Email Address        |

## ATTACHMENT

### 5. Additional Bar Memberships.

| Court   | Date Admitted | Good Standing |
|---|---------------|---------------|
| Supreme Court of Alabama                        | 2007          | Yes           |
| New York  | 2006          | Yes           |
| District of Columbia                            | 2006          | Yes           |
| United States Supreme Court                     | 2016          | Yes           |
| US Court of Appeals, Third Circuit              | 2015          | Yes           |
| US Court of Appeals, Fifth Circuit              | 2012          | Yes           |
| US Court of Appeals, Sixth Circuit              | 2015          | Yes           |
| US Court of Appeals, Eighth Circuit             | 2015          | Yes           |
| US Court of Appeals, Ninth Circuit              | 2017          | Yes           |
| US Court of Appeals, Eleventh Circuit           | 2008          | Yes           |
| US Court of Appeals, Federal Claims             | 2013          | Yes           |
| US Court of Appeals, D.C. Circuit               | 2006          | Yes           |
| US District Court, Southern District of Alabama | 2008          | Yes           |
| US District Court, Northern District of Alabama | 2008          | Yes           |
| US District Court, Middle District of Alabama   | 2008          | Yes           |
| US District Court, Colorado                     | 2018          | Yes           |
| US District Court, Northern District of Texas   | 2013          | Yes           |
| US District Court, Western District of Texas    | 2013          | Yes           |
| US District Court, Eastern District of Texas    | 2013          | Yes           |

10. Has Applicant previously filed an application to appear *pro hac vice* in South Carolina cases? If yes, 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.

- a. *Tammy Harrison v. Encore Capital Group, Inc., et al.*, D.S.C. No. 4:16-cv-00442 (dismissed). Application filed 2016, granted. Local counsel: Robert Lesley Brown.
- b. *Vicki Loggins v. Midland Funding LLC, et al.*, D.S.C. No. 6:13-cv-01497 (dismissed). Application filed 2013, granted. Local counsel: Dowse Bradwell Rustin, W.
- c. *Johnny Marvin Martin v. Midland Funding, LLC*, Bankr. D.S.C. No. 3:16-ap-80099 (dismissed). Application filed 2016, granted. Local counsel: Brandon K. Poston.
- d. *La'Sharra Valisha McClain v. Midland Funding, LLC*, Bankr. D.S.C. No. 7:16-ap-80100 (dismissed). Application filed 2016, granted. Local counsel: Brandon K. Poston.
- e. *Jonathan Alston, et al v. Midland Credit Management, Inc.*, D.S.C. No. 8:18-cv-00014 (dismissed). Application filed 2018, granted. Local Counsel: Robert Lesley Brown.

- f. *Sherell Robinson v. Midland Credit Management Inc.*, D.S.C. No. 2:19-cv-00458 (dismissed). Application filed 2019, granted. Local counsel: Robert Lesley Brown.
- g. *Kathryn Bevan v. Capital One Bank, et al.*, No.: 3:23-cv-00586-CMC (dismissed). Application filed 04/18/2023, granted. Local counsel: J. Christina Boardman Kuklinksi.

South Carolina Bar Number  
(You must provide Bar Number)

10. Has Applicant previously filed an application to appear *pro hac vice* in South Carolina cases? If yes, 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.


See attachment.

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

Yes.

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

DATED this 13th day of November, 2023

  
APPLICANT

**VERIFICATION**

STATE OF Alabama )

COUNTY OF Jefferson )

I, Jason B. Tompkins, 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.

Jason B. Tompkins  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 13th day of November, 20 23

Christina Huff  
(Notary Signature)

Notary Public for the State of Alabama  
My Commission Expires: 12-28-26



**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 13th day of November, 20 23

J Boardman Kublinski  
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 14th day of November, 20 23

J Boardman Kublinski

# The Supreme Court of Alabama



## Certificate Of Admission

*I, Megan B. Rhodebeck, Clerk of the Supreme Court of Alabama, do hereby certify that* Jason Brent Tompkins *was duly and legally admitted to practice law by the Supreme Court of Alabama on* April 27, 2007 *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* November 14, 2023 *with the seal of the Supreme Court of Alabama attached.*



Megan B. Rhodebeck

*Megan B. Rhodebeck  
Clerk of the Supreme Court of Alabama*