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Greenville, South Carolina 29601
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RECEIVED
Apr 24 2024
SC Court of Appeals

April 18, 2024

VIA EMAIL AND U.S. MAIL

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211
ctappfilings@sccourts.org

Re: Skylar Blume et al. v. Starbucks Corporation, et al., Appellate Case No. 2023-001506

Dear Madam Clerk:

This letter seeks guidance from the Court of Appeals on how best to move before this Court for *pro hac vice* admission of Charlotte H. Schwartz on behalf of the Respondents in this matter. This appeal regards the circuit court's denial of a motion to dismiss and compel arbitration. The notice of appeal in this matter was filed on or around September 22, 2023. After the notice of appeal was filed, the parties disagreed as to whether the case was stayed in the circuit court. The circuit court heard motions following the notice of appeal and ultimately stayed the case pending appeal on November 22, 2023.

Prior to the order staying the case in circuit court, Respondents filed a motion for *pro hac vice* admission on Charlotte H. Schwartz in circuit court on November 2, 2023, along with the verified application that had been submitted by Ms. Schwartz and the undersigned. (Ex. A). On November 14, 2023, The Supreme Court of South Carolina issued a letter to the Clerk of Court for Anderson County certifying the verified application. (Ex. B). The case was subsequently stayed by the Circuit Court Judge without the motion being heard.

Pursuant to Rule 404(c) of South Carolina Appellate Court Rules, *pro hac vice* admission "shall continue through the remainder of the action or proceeding, including any appellate proceedings." In this instance, the motion was pending before the circuit court along with the letter from the Supreme Court but then was not actually granted prior to the stay being entered.

Respondents request that the Court of Appeals grant the pending motion as it is unopposed by Appellants' counsel. In the alternative, Respondent requests the Court to direct Respondent how best to move for Ms. Schwartz' admission before this Court given she has already submitted her Verified Application and paid the required fees.



Regards,

A handwritten signature in blue ink, appearing to read "M. Ozment", with a long horizontal flourish extending to the right.

Matthew R. Ozment

Exhibit A

1. I will personally sign each pleading, motion, discovery procedure, or other document that I serve or file in this Court;
2. All pleadings and other documents that I file in this case will contain my name, firm name, address, and phone number and those of my associate counsel admitted *pro hac vice*;
3. 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*; and
4. Unless excused by the Court, I will be present at all pretrial conferences, hearings, and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.

Grove Ozment LLC
Firm Name

Matthew R. Ozment
Name of Local Counsel

100 Williams Street
Street Address

s/ Matthew R. Ozment
Signature of Local Counsel

Greenville, South Carolina 29601
City, State, Zip Code

Local Counsel for Plaintiffs

(864) 516-2222
Telephone Number

State Bar Number: 80072

Court:	Date Admitted:
U.S. Court of Appeals for the Federal Circuit	12/2/2022
U.S. Court of Appeals for the Sixth Circuit	3/22/2023
U.S. District Court for the District of Columbia	6/5/2023

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 Matthew Ozment
of the Grove Ozment law firm, which has offices at:

100 Williams Street

Street Address	Greenville	SC	29601
Greenville	Greenville	State	Zip Code
City	County	Fax Number	Email Address
(864) 516-2266			matt@go-lawyers.com
Primary Telephone	Cell Phone		
80072			
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 22nd day of March, 2023


APPLICANT

VERIFICATION

STATE OF District of Columbia)

COUNTY OF _____)

I, Charlotte Schwartz, 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.

Charlotte Schwartz

APPLICANT/AFFIANT

Subscribed and sworn to before me this 22nd day of March, 20 23

Jessie M. Beyderman

Notary Public for the State of District of Columbia

My Commission Expires: July 31, 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 October, 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

31st day of October, 20 23

Charlotte Schwartz

APPLICANT/AFFIANT

Exhibit B



The Supreme Court of South Carolina
Office of Bar Admissions

PATRICIA A. HOWARD
CLERK OF COURT

KATHLEEN "TINA" BRYANT
MANAGER, OFFICE OF BAR
ADMISSIONS

POST OFFICE BOX 11330
COLUMBIA, SOUTH CAROLINA 29211
TELEPHONE: (803) 734-1317
FAX: (803) 734-0394

23 NOV 17 AM 11:52:15
Anderson, SC COC, CP/SS

November 14, 2023

The Honorable C. Reena Thomason
Clerk of Court
P.O. Box 8002
Anderson, SC 29622-8002

RE: Blume, et al. v. Starbucks Corporation, et al.

Case No.: 2022-CP-04-02159

Dear Ms. Thomason:

I certify that the Office of Bar Admissions has received the verified application requesting Charlotte H. Schwartz be admitted *pro hac vice* in the above action. The \$250 filing fee for the applicant has been paid.

Sincerely,

M.J. Thames
Bar Admissions Coordinator

cc: Charlotte H. Schwartz, Esquire
Matthew Ozment, Esquire