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May 15 2024

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

APPEAL FROM THE ADMINISTRATIVE LAW COURT
Ralph King Anderson, III, Chief Administrative Law Judge

Appellate Case No. 2024-000625
Trial Court Case No. 17-ALJ-17-0238-CC

Amazon Services, LLCPetitioner,

v.

South Carolina Department of Revenue Respondent.

MOTION FOR ADMISSION PRO HAC VICE OF ERIK R. ZIMMERMAN

Pursuant to Rule 404 of the South Carolina Rules of Appellate Practice, Stephen M. Cox of Robinson, Bradshaw & Hinson, P.A., respectfully requests that the Court enter an Order permitting Erik R. Zimmerman to appear pro hac vice in this appeal as counsel for amici curiae the Chamber of Commerce of the United States of America, Business Roundtable, NetChoice, the South Carolina Chamber of Commerce, and the Greater Columbia Chamber of Commerce and would show the Court as follows:

1. Erik R. Zimmerman is a member in good standing of the bar in the highest Court of the State of North Carolina, as well as the courts indicated in

Mr. Zimmerman's Verified Application for Admission Pro Hac Vice. In addition, Mr. Zimmerman is an attorney with the law firm of Robinson, Bradshaw & Hinson, P.A. and is counsel for amici curiae the Chamber of Commerce of the United States of America, Business Roundtable, NetChoice, the South Carolina Chamber of Commerce, and the Greater Columbia Chamber of Commerce.

2. Mr. Zimmerman is handling this matter in association with Stephen M. Cox, who is a member in good standing of the South Carolina Bar.

3. This motion is supported by the attached Verified Application for Admission Pro Hac Vice of Erik R. Zimmerman, a copy of which has been served on the South Carolina Supreme Court Office of Bar Admission, along with a \$250 check made payable to the South Carolina Supreme Court.

WHEREFORE, the movant prays for an order of this Court permitting the appearance of Erik R. Zimmerman pro hac vice in this appeal for amici curiae the Chamber of Commerce of the United States of America, Business Roundtable, NetChoice, the South Carolina Chamber of Commerce, and the Greater Columbia Chamber of Commerce.

s/ Stephen M. Cox

Stephen M. Cox

S.C. Bar No. 12263

ROBINSON, BRADSHAW & HINSON, P.A.

202 E. Main Street, Suite 201

Rock Hill, South Carolina 29730

(803) 325-2900

scox@robinsonbradshaw.com

Dated: May 15, 2024

Attorney for Amici Curiae



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

May 8, 2024

The Honorable Patricia A. Howard
Clerk of Court, Supreme Court of South Carolina
1231 Gervais Street
Columbia, S.C. 29201

RE: Amazon Services, LLC v. South Carolina Department of Revenue

Case No.: 2024-000625

Dear Ms. Howard:

I certify that the Office of Bar Admissions has received a verified application requesting Erik R. Zimmerman be admitted *pro hac vice* in the above matter. The \$250 filing fee for the applicant has been paid.

Sincerely,

M.J. Thames
Bar Admissions Coordinator

cc: Erik R. Zimmerman
Stephen M. Cox

#275

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.

<u>Amazon Services, LLC,</u> Plaintiff	<u>2024-000625</u> Case No.	<u>South Carolina Supreme Court</u> Tribunal
vs.		
<u>South Carolina Department of Revenue.</u> Defendant	Mailing Address of Tribunal: RECEIVED MAY 08 2024	<u>P.O. Box 11330</u> <u>Columbia, SC 29211</u>

Comes now Erik R. Zimmerman S.C. SUPREME COURT applicant herein, and respectfully represents the following:

1. Applicant resides at:
207 Graylyn Dr.
 Street Address
Chapel Hill Orange North Carolina 27516
 City County State Zip Code
919-434-8440
 Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Robinson, Bradshaw & Hinson, P.A., with offices at
1450 Raleigh Road, Suite 100
 Street Address
Chapel Hill Orange North Carolina 27517
 City County State Zip Code
919-328-8800 919-434-8440 ezimmerman@robinsonbradshaw.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 The Chamber of Commerce of the United States of America 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 March 28 of 2016, 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 North Carolina 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:
U.S. Supreme Court	8/10/2015
U.S. Court of Appeals for the Second Circuit	9/9/2011
U.S. Court of Appeals for the Third Circuit	12/14/2020
U.S. Court of Appeals for the Fourth Circuit	5/12/2009
U.S. Court of Appeals for the Sixth Circuit	4/15/2011
U.S. Court of Appeals for the Seventh Circuit	12/8/2023
U.S. Court of Appeals for the Ninth Circuit	10/18/2022
U.S. Court of Appeals for the D.C. Circuit	8/15/2012
U.S. District Court for the Eastern District of North Carolina	11/10/2016
U.S. District Court for the Middle District of North Carolina	12/16/2016
U.S. District Court for the Western District of North Carolina	12/16/2016
District of Columbia	11/7/2008
Maryland	12/12/2007
North Carolina	3/28/2016

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 Stephen M. Cox of the Robinson, Bradshaw & Hinson, P.A. law firm, which has offices at:

202 E. Main Street, Suite 201
Street Address

Rock Hill York SC 29730
City County State Zip Code

(803) 325-2900
Primary Telephone Cell Phone Fax Number Email Address

12263
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.

Yes, Case No. 2022-001574, *Stephen R. Edwards, individually and as personal representative of the Estate of Steven Redfearn Stewart v. Scapa Waycross, Inc.* Case is closed. Application date: June 15, 2023. Local counsel: Stephen M. Cox of Robinson, Bradshaw & Hinson, P.A. Application was granted on July 3, 2023.

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 6th day of May, 2024


APPLICANT

VERIFICATION

STATE OF NORTH CAROLINA)

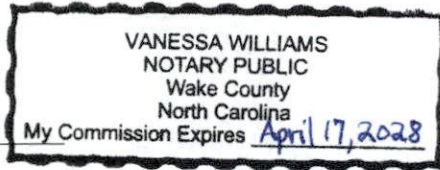
COUNTY OF ORANGE)

I, Erik R. Zimmerman, 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 6th day of May, 2024

[Signature]
(Notary Signature)



Notary Public for the State of North Carolina

My Commission Expires: April 17, 2028

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 7th day of May, 2024

[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 7th day of May, 20 24

[Signature]
APPLICANT/AFFIANT

Supreme Court OF THE STATE OF NORTH CAROLINA



I, Grant E. Buckner, Clerk of the Supreme Court of North Carolina, do hereby certify that on March 28, 2016, license to practice as an Attorney and Counselor at Law in all the Courts of this State was issued by the North Carolina Board of Law Examiners to

Erik R. Zimmerman

according to the certified list of licentiates reported by the Secretary of said Board and filed in my office as required by statute.

To the date of this certificate, no order revoking said license has been filed with this Court and no order suspending same is in effect.

WITNESS my hand and the Seal of the Supreme Court of North Carolina at office in Raleigh, this May 3, 2024.

A handwritten signature in black ink, appearing to read "Grant E. Buckner".

Grant E. Buckner
Clerk of the Supreme Court
of the State of North Carolina

