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JUN 12 2024

**The Supreme Court of South Carolina**

S.C. SUPREME COURT

**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

June 12, 2024

The Honorable Patricia Howard  
Clerk of Court  
South Carolina Supreme Court  
PO Box 11330  
Columbia, SC 29211

RE: Stephanie Greene v. State of South Carolina

Case No.: 2019-CP-42-01605

Dear Ms. Howard:

I certify that the Office of Bar Admissions has received a verified application requesting Karen Thompson 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: Karen Thompson  
Allison Elder

#341

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>Stephanie Greene</u> Plaintiff	<u>2019-CP-42-01605</u> Case No.	<u>South Carolina Supreme Court</u> Tribunal
vs.	Mailing Address of Tribunal:	<u>P.O. Box 11330</u> <u>Columbia, SC 29211</u>
<u>State of South Carolina</u> Defendant		

Comes now Karen Thompson, applicant herein, and respectfully represents the following:

1. Applicant resides at:  
135 Clinton Ave. Apartment #3

<u>Street Address</u> <u>Brooklyn</u>	<u>Kings</u> County	<u>NY</u> State	<u>11206</u> Zip Code
<u>City</u> <u>347-573-9601</u>			
<u>Telephone</u>			

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2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Pregnancy Justice, with offices at

<u>575 8th Ave, Suite 700</u>			
<u>Street Address</u> <u>New York</u>	<u>New York</u> County	<u>NY</u> State	<u>10018</u> Zip Code
<u>City</u> <u>212-255-9252</u>			<u>karen.t@pregnancyjusticeus.org</u>
<u>Primary Telephone</u>	<u>Cell Phone</u>	<u>Fax Number</u>	<u>Email Address</u>

3. Applicant has been retained personally or as a member of the above-named law firm by Allison Elder 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 September of 2004, 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 New York 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:
Southern District of New York, U.S. District Court	May 2005
New Jersey	May 2019
New York	2004

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 Allison Elder of the Time Served

law firm, which has offices at:

P.O. Box 615  
 Street Address  
Taylors Greenville SC 29687  
 City County State Zip Code  
(864) 546-5060 aelder@tsscnow.org  
 Primary Telephone Cell Phone Fax Number Email Address

104123

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.

Page v. State, No. 2017-002448, 2020 WL 1492852 (S.C. Ct. App. Mar. 25, 2020); Applied June 2017, granted; Local Counsel Christopher Reginald Geel of Geel Law Firm, LLC

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 1 day of May, 2024

APPLICANT

**VERIFICATION**

STATE OF NEW YORK )

COUNTY OF NEW YORK )

I, KAREN D. THOMPSON, 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 1 day of May, 20 24

[Signature]  
(Notary Signature)

Dara R. Gell  
Registration No. 02GE6444776  
Issued in Kings county

Notary Public for the State of New York

My Commission Expires: 12/05/2026

**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 30<sup>th</sup> day of May, 20 24

[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

30<sup>th</sup> day of May, 20 24

[Signature]



*Appellate Division of the Supreme Court  
of the State of New York  
Second Judicial Department*

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*I, Darrell M. Joseph, Clerk of the Appellate Division of the Supreme Court of the State of New York, Second Judicial Department, do hereby certify that*

*Karen Denise Thompson*

*was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on September 22, 2004, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors at Law on file in this office, is duly registered with the Office of Court Administration, and according to the records of this Court is currently in good standing as an Attorney and Counselor-at-Law.*

*In Witness Whereof, I have hereunto set my hand in the City of Brooklyn on April 24, 2024.*

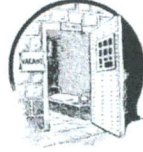


*Darrell M. Joseph*

*Clerk of the Court*

# Time Served

(864) 546-5060 | [www.tsscnow.org](http://www.tsscnow.org)



*Office Address*  
222 Rutherford St.  
Greenville, SC 29609

*Mailing Address*  
P.O. Box 615  
Taylors, SC 29687

Supreme Court of South Carolina  
Office of Bar Admissions  
P.O. Box 11330  
Columbia, SC 29211

May 30, 2024

To Whom it May Concern:

Enclosed please find Verified Applications for Admission Pro Hac Vice for Ms. Kelly Keglovits and Ms. Karen Thompson, both of Pregnancy Justice out of New York. Please also find a business check for \$500 for their applications.

If you have any questions or concerns, please contact me by phone at (864) 520-5631, or by email at [aelder@tsscnow.org](mailto:aelder@tsscnow.org). Thank you very much for your assistance.

Best,

Allison Elder  
Executive Director  
Time Served

\*Enclosures

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