

THE STATE OF SOUTH CAROLINA
In the Supreme Court

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Jun 04 2024

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

S.C. SUPREME COURT

The Honorable Mark Hayes, Circuit Court Judge

Appellate Case No. 2023-001934

STEPHANIE IRENE GREENE.....Petitioner,

v.

STATE OF SOUTH CAROLINA.....Respondent.

AMICI MOTION FOR ADMISSIONS *PRO HAC VICE*

I, Allison Elder, as counsel of record for *amici curiae* and member in good standing of the state bar of South Carolina, hereby move this court and the South Carolina Public Service Commission (“Commission”) to permit Kelly Keglovits, an attorney admitted and authorized to practice law in the highest court of the State of New York, as verified in the attached application, incorporated herein by reference, to practice Pro Hac Vice before the Commission in the above-captioned proceeding.

This motion is made upon and is supported by the Verified Application for Admission Pro Hac Vice in the State of South Carolina of Kelly Keglovits, which has been filed with the

South Carolina Supreme Court Office of Bar Admissions along with the \$250.00 filing fee pursuant to Rule 404, SCACR.

WHEREFORE, as the provisions of Rule 404, SCACR, have been met, the undersigned local counsel hereby moves, together with the attached Application and Affidavit, that this motion be granted and Kelly Keglovits be admitted pro hac vice in the above-captioned case as associate counsel. The original of the Verified Application is attached hereto.

Respectfully submitted,

/s/ Allison Elder

Allison Elder

Bar # 104123

Time Served

P.O. Box 615

Taylors, SC 29687

(864) 546-5060

aelder@tsscnow.org

Counsel for *Amici Curiae*

June 4, 2024

**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.

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

Comes now Kelly Keglovits, applicant herein, and respectfully represents the following:

1. Applicant resides at:
362 11th Street Apartment #4
 Street Address
Brooklyn Kings New York 11215
 City County State Zip Code
918-344-6906
 Telephone

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 575 8th Ave Suite 700
 Street Address
New York New York NY 10018
 City County State Zip Code
212-255-9252 kelly.k@pregnancyjusticeus.org
 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 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 May of 2024, 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: |
|----------|----------------|
| New York | May 06, 2024 |
| | |
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| | |

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:

| | | | |
|--------------------------|---------------------|---------------------|---------------------------|
| <u>P.O. Box 615</u> | <u>Greenville</u> | <u>SC</u> | <u>29687</u> |
| <u>Street Address</u> | <u>County</u> | <u>State</u> | <u>Zip Code</u> |
| <u>Taylors</u> | <u>864-520-5631</u> | <u>864-546-5080</u> | <u>aeider@tsscnow.org</u> |
| <u>City</u> | <u>Cell Phone</u> | <u>Fax Number</u> | <u>Email Address</u> |
| <u>864-546-5060</u> | | | |
| <u>Primary Telephone</u> | | | |

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.

No

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 8 day of May, 20 24


APPLICANT

VERIFICATION

STATE OF New York)

COUNTY OF New York)

I, Kelly Keglavits, 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.

Kelly Keglavits
APPLICANT/AFFIANT

Subscribed and sworn to before me this 8 day of May, 20 24

[Signature]
(Notary Signature)

Dara R. Gell
Reg No. 02GE6444776
County - Kings

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 30th day of May, 20 24

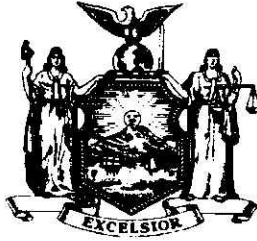
Allison Elder
LOCAL COUNSEL OF RECORD

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

30th day of May, 20 24

Allison Elder

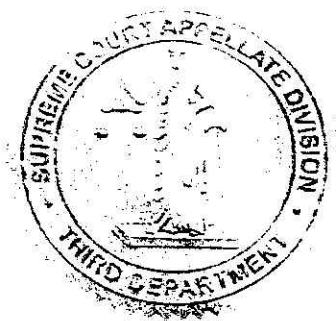


*Appellate Division of the Supreme Court
of the State of New York
Third Judicial Department*

I, Robert D. Mayberger, Clerk of the Appellate Division of the Supreme Court of the State of New York, Third Judicial Department, do hereby certify that

Kelly Marie Keglovits

was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on May 6, 2024, 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 Albany on May
7, 2024.*

Robert D Mayberger

Clerk of the Court