



October 16, 2024

RECEIVED
OCT 16 2024
S.C. SUPREME COURT

VIA HAND DELIVERY
South Carolina Supreme Court
Attn: Patricia Howard, Clerk of Court
1231 Gervais Street
Columbia, SC 29201

Re: League of Women Voters of South Carolina v. Thomas Alexander, et al.
Appellate Case No.: 2024-001227

Dear Ms. Howard:

Enclosed herewith for filing please find a Motion for Pro Hac Vice Admission for Adriel I. Cepeda Derieux along with a check in the amount of \$50.00 for the filing fee.

By copy of letter to all counsel of record we are serving them with a copy of the same.

Sincerely,

A handwritten signature in blue ink that reads "Christina Metze". The signature is written in a cursive, flowing style.

Christina Metze
Executive Assistant

Enclosures

cc: Patrick Wooten, Esq.
Wilson Daniel, Esq.
Theresa J. Lee, Esq.
Thomas W. Nicholson, Esq.
Thomas A. Limehouse, Esq.
Tyra S. McBride, Es.
Mark C. Moore, Esq.
Michael A. Parente, Esq.
Andrew A. Mathias, Esq.

Michael R. Burchstead, Esq.
Mary Elizabeth Crum, Esq.
Tracey C. Green, Esq.
Benjamin R. Jenkins, IV, Esq.
Wm. Grayson Lambert, Esq.
Erica Wells Shedd, Esq.
John M. Gore, Esq.
Sophia Lin Lakin, Esq.
Adriel I. Cepeda Derieux, Esq.

IN THE STATE OF SOUTH CAROLINA

In the Supreme Court

IN THE ORIGINAL JURISDICTION

Appellate Case No.: 2024-001227

League of Women Voters of South Carolina, Plaintiff/Petitioner

v.

Thomas Alexander, in his official capacity as President of the South Carolina Senate; Murrell Smith, in his official capacity as Speaker of the South Carolina House of Representatives; and Howard Knapp, in his official capacity as Director of the South Carolina Election Commission,

Defendants/Respondents.

MOTION FOR PRO HAC VICE ADMISSION

Pursuant to Rule 404, SCACR the undersigned submits this motion for pro hac vice admission of Adriel I. Cepeda Derieux. In support of this motion, enclosed is the verified application, as well as a letter from the Office of Bar Admissions certifying receipt, and the required \$250.00 filing fee paid. *See* Rule 404(d)-(e), SCACR. The undersigned is familiar with and assumes the responsibilities imposed on local counsel under Rule 404(i), SCACR. For these reasons, the undersigned respectfully requests that the Court grant pro hac vice admission to attorney Cepeda Derieux.

(signature page follows)

Respectfully submitted,

ACLU of South Carolina



Allen Chaney

S.C. Bar No. 104038

P.O. Box 1668

Columbia, SC 29202

(864) 372-6681

achaney@aclusc.org

EXHIBIT 1



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

October 10, 2024

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

RE: League of Women Voters of South Carolina v. Thomas Alexander, et al.

Case No.: 2024-001227

Dear Ms. Howard:

I certify that the Office of Bar Admissions has received a verified application requesting Adriel I. Cepeda Derieux 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: Adriel I. Cepeda Derieux
Allen Chaney

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:
Supreme Court of the United States	May 19, 2014
Southern District of NY	May 20, 2014
Eastern District of NY	June 2, 2014
U.S. Court of Appeals for the Ninth Circuit	May 22, 2015
U.S. Court of Appeals for the First Circuit	March 15, 2016
U.S. Court of Appeals for the Second Circuit	March 17, 2016
U.S. Court of Appeals for the Third Circuit	March 25, 2016
U.S. Court of Appeals for D.C. Circuit	May 16, 2016
U.S. Court of Appeals for Seventh Circuit	March 24, 2017
U.S. Court of Appeals for Fourth Circuit	May 19, 2020
U.S. Court of Appeals for Tenth Circuit	May 1, 2020
U.S. Court of Appeals for Federal Circuit	June 9, 2011
U.S. Court of Appeals for Fifth Circuit	November 9, 2020

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 Allen Chaney of the ACLU of South Carolina law firm, which has offices at:

P.O. Box 1668

Street Address	Richland County	South Carolina	29202
Columbia, SC	County	State	Zip Code
(864) 372-6681			achaney@aclusc.org
Primary Telephone	Cell Phone	Fax Number	Email Address
104038			
South Carolina Bar Number			
(You must provide Bar Number)			

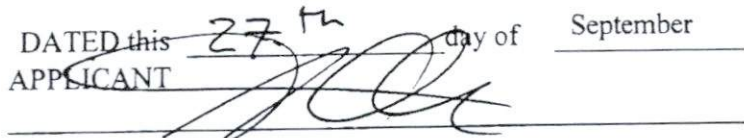
10. Has Applicant previously filed an application to appear *pro hac vice* in South Carolina cases? If yes, give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted.

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 27th day of September, 2024
APPLICANT 

VERIFICATION

STATE OF Washington, D.C.

COUNTY OF District of Columbia

I, Adriel I. Cepeda Derieux, 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.

[Handwritten Signature]

APPLICANT/AFFIANT

Subscribed and sworn to before me this 27th day of September, 20 24

[Handwritten Signature]
(Notary Signature)

Notary Public for the State of DC
My Commission Expires: 08-31-2028

DON H. KIM
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires August 31, 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 4th day of October, 20 24

[Handwritten Signature]
LOCAL COUNSEL OF RECORD

CERTIFICATE OF SERVICE

hand delivery

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 October, 2024

[Handwritten Signature]



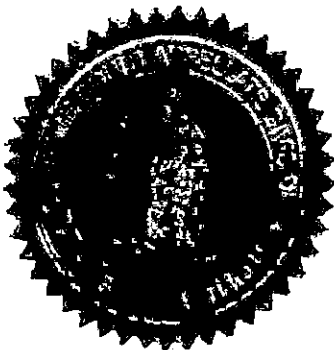
*Appellate Division of the Supreme Court
of the State of New York
First Judicial Department*

I, Susanna M. Rojas, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, do hereby certify that

Adriel I. Cepeda Derieux

was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on April 6, 2011, 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 New York on September 16, 2024.



Susanna M. Rojas

Clerk of the Court



Supreme Court of the State of New York
Appellate Division, First Department

DIANNE T. RENWICK
PRESIDING JUSTICE

SUSANNA MOLINA ROJAS
CLERK OF THE COURT

MARGARET SOWAH
DEPUTY CLERK OF THE COURT

DOUGLAS C. SULLIVAN
DEPUTY CLERK OF THE COURT

To Whom It May Concern

An attorney admitted to practice by this Court may request a certificate of good standing, which is the only official document this Court issues certifying to an attorney's admission and good standing.

An attorney's registration status, date of admission and disciplinary history may be viewed through the attorney search feature on the website of the Unified Court System.

New York State does not register attorneys as active or inactive.

An attorney may request a disciplinary history letter from the Attorney Grievance Committee of the First Judicial Department.

Bar examination history is available from the New York State Board of Law Examiners.

Instructions, forms and links are available on this Court's website.

Susanna Rojas
Clerk of the Court