



October 16, 2024

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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 Theresa J. Lee 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

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IN THE ORIGINAL JURISDICTION

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Appellate Case No.: 2024-001227

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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.

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MOTION FOR PRO HAC VICE ADMISSION

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Pursuant to Rule 404, SCACR the undersigned submits this motion for pro hac vice admission of Theresa J. Lee. 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 Lee.

*(signature page follows)*

Respectfully submitted,

ACLU of South Carolina



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Allen Chaney

S.C. Bar No. 104038

P.O. Box 1668

Columbia, SC 29202

(864) 372-6681

[achaney@aclusc.org](mailto: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 Theresa J. Lee 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: Theresa J. Lee  
Allen Chaney

**VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE* IN THE STATE OF SOUTH CAROLINA**

**S.C. SUPREME COURT**

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>League of Women Voters of South Carolina</u>	<u>2024-001227</u>	<u>South Carolina Supreme Court</u>
Plaintiff	Case No.	Tribunal
vs.	Mailing Address of Tribunal:	<u>1231 Gervais Street</u>
<u>Thomas Alexander, et al</u>		<u>Columbia, SC 29201</u>
Defendant		

Comes now Theresa J. Lee, applicant herein, and respectfully represents the following:

1. Applicant resides at:

101 Lafayette Avenue, Apt. 14G

<u>Street Address</u>	<u>Brooklyn</u>	<u>Kings</u>	<u>NY</u>	<u>11217</u>
City	212-549-2500	County	State	Zip Code
<u>Telephone</u>				

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of)

American Civil Liberties Union, with offices at

125 Broad Street, Floor 18

<u>Street Address</u>	<u>New York</u>	<u>New York</u>	<u>NY</u>	<u>10004</u>
City	(212) 549-2500	County	State	Zip Code
<u>Primary Telephone</u>		<u>Cell Phone</u>	<u>Fax Number</u>	<u>Email Address</u>
				<u>flee@aclu.org</u>

3. Applicant has been retained personally or as a member of the above-named law firm by

League of Women Voters of South Carolina 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 9th of April, 2012, 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 (5022769) 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 State Bar	April 9, 2012
U.S. District Court for the Southern District of New York	March 18, 2014
U.S. District Court for the Eastern District of New York	March 18, 2014
U.S. District Court for the District of Colorado	October 20, 2021
Commonwealth of Massachusetts Bar	June 14, 2023
U.S. Supreme Court	August 25, 2017
U.S. Court of Appeals for the Second Circuit	February 18, 2016
U.S. Court of Appeals for the Fifth Circuit	October 28, 2019
U.S. Court of Appeals for the Six Circuit	January 9, 2019
U.S. Court of Appeals for the Ninth Circuit	May 24, 2023
U.S. Court of Appeals for the Eleventh Circuit	November 7, 2022

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
City			achaney@aclusc.org
(864) 372-6681			Email Address
Primary Telephone	Cell Phone	Fax Number	
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 17th day of September, 2024

APPLICANT  
*Theresa J. Free*

**RECEIVED**  
OCT 07 2024  
S.C. SUPREME COURT

VERIFICATION

RECEIVED

OCT 07 2024

S.C. SUPREME COURT

STATE OF New York )

COUNTY OF New York )

I, Theresa J. Lee, 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.

Theresa J. Lee  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 17<sup>th</sup> day of September, 20 24

James D. Esseks  
(Notary Signature)

Notary Public for the State of

JAMES D. ESSEKS  
Notary Public, State of New York  
No. 02ES5042856  
Qualified in New York County  
Commission Expires May 1, 19 6/22/2027

My Commission Expires:

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 4<sup>th</sup> day of OCTOBER ~~September~~, 20 24

D. Chancy J.  
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

7<sup>th</sup> day of October, 2024

Christina Metz



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

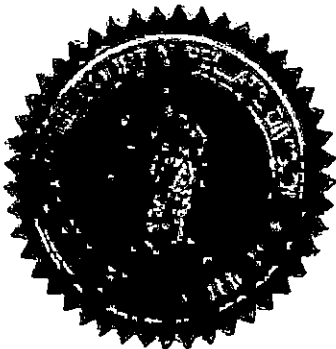
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*I, Susanna M. Rojas, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, do hereby certify that*

*Theresa Jeane Lee*

*was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on April 9, 2012, 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