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Jan 09 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM ANDERSON COUNTY
Court of Common Pleas
The Honorable R. Lawton. McIntosh., Circuit Court Judge

Appellate Case No. 2023-001506

Skylar Blume, Virgil Dowis, Rhi Greer,
Jonathan Hudson, Natalie Mann, Mya Ourada,
Braden Terrill, & Aneil Thirpathi,.....Respondent.

v.

Starbucks Corporation & Melissa Morris,.....Appellant.

MOTION IN SUPPORT OF *PRO HAC VICE*
APPLICATION OF CHARLOTTE H. SCHWARTZ

Matthew R. Ozment, counsel for the Plaintiffs in this case and a member in good standing of the bar of the State of South Carolina admitted to practice before this Court hereby moves for the admission and appearance in the above-captioned case of Charolotte H. Schwartz , an attorney admitted and authorized to practice law in the highest court of the District of Columbia, as verified in the application, which is incorporated herein by reference. This motion is made upon and is supported by the Verified Application for Admission *Pro Hac Vice* in the State of South Carolina of Charolotte H. Schwartz, 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.

Respondents’ counsel has conferred with Appellants’ counsel and this motion is unopposed.

The undersigned local counsel hereby moves, together with the attached Application and

Affidavit, that Charlotte H. Schwartz be admitted *pro hac vice* in the above-captioned case as associate counsel. As local counsel, I understand that:

1. I will personally sign each pleading, motion, discovery procedure, or other document that I serve or file in this Court;
2. All pleadings and other documents that I file in this case will contain my name, firm name, address, and phone number and those of my associate counsel admitted *pro hac vice*;
3. Service of all pleadings and notices as required shall be sufficient if served upon me, and it is my responsibility to serve my associate counsel admitted *pro hac vice*; and
4. Unless excused by the Court, I will be present at all pretrial conferences, hearings, and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.

WHEREFORE, local counsel respectfully requests that the Court enter an order admitting Charlotte H. Schwartz *pro hac vice* in the above-captioned case as associate counsel.

GROVE OZMENT, L.L.C.

/s/Matthew R. Ozment
Matthew R. Ozment (#80072)
Email: Matt@go-lawyers.com
100 Williams Street
Greenville, SC 29601
Telephone: 864-516-2222

January 9, 2025

**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>Blume, et al.</u> Plaintiff	<u>2023-001506</u> Case No.	<u>The State of South Carolina Court of Appeals</u> Tribunal
vs.		
<u>Starbucks Corporation & Melissa Morris</u> Defendant	Mailing Address of Tribunal:	<u>1220 Senate Street</u> <u>Columbia, SC 29201</u>

Comes now Charlotte H. Schwartz, applicant herein, and respectfully represents the following:

1. Applicant resides at:
518 13th Street, NE
Street Address
Washington County DC State 20002 Zip Code
203-390-7029
Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) James & Hoffman, P.C., with offices at
1629 K Street NW, Suite 1050
Street Address
Washington County DC State 20006 Zip Code
202-496-0500 202-496-0555 chschwartz@jamhoff.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 Plaintiffs Blume et al. 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 January of 2020, 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 _____ 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:
See Attachment.	

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; N/A

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.

N/A

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.

N/A

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.

N/A

9. Please be aware that local counsel must be Rule 403 certified. Local counsel of record associated with Applicant in this case is Matthew Ozment of the Grove Ozment

law firm, which has offices at:

100 Williams Street
 Street Address
Greenville Greenville SC 29601
 City County State Zip Code
864-516-2266 _____ _____ matt@go-lawyers.com
 Primary Telephone Cell Phone Fax Number Email Address

VERIFICATION

STATE OF District of Columbia

COUNTY OF _____)

I, Charlotte Schwartz, 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.

Charlotte Schwartz

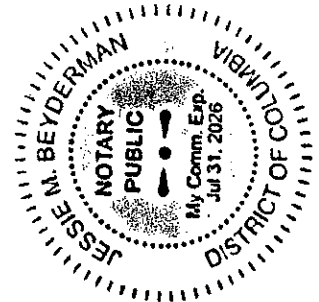
APPLICANT/AFFIANT

Subscribed and sworn to before me this 17th day of October, 20 24

Jessie M. Bayle
(Notary Signature)

Notary Public for the State of District of Columbia

My Commission Expires: July 31, 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 20th day of December, 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

20th day of December, 20 24

Charlotte Schwartz

80072

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.

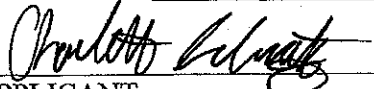
Yes. Case Name: Blume v. Starbucks; Status: Stayed/On Appeal; Date of Application: 11/2/23; Local Counsel: Matthew Ozment, Esq.; Application Pending

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 20th day of December, 20 24


APPLICANT

Attachment – List of Courts Admitted to Practice

Court:	Date Admitted:
District of Columbia	1/24/2020
New York	10/17/2022
U.S. District Court for the District of Columbia	6/5/2023
U.S. Court of Appeals for the Fifth Circuit	10/7/2024
U.S. Court of Appeals for the Sixth Circuit	3/22/2023
U.S. Court of Appeals for the Tenth Circuit	5/12/2022
U.S. Court of Appeals for the Federal Circuit	12/2/2022
U.S. Court of Federal Claims	2/16/2024
U.S. Supreme Court	3/18/2024



DC BAR

*On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals,
the District of Columbia Bar does hereby certify that*

Charlotte Hannah Schwartz

*was duly qualified and admitted on January 24, 2020 as an attorney and counselor entitled to
practice before this Court; and is, on the date indicated below, an Active member in good
standing of this Bar.*

*In Testimony Whereof,
I have hereunto subscribed my
name and affixed the seal of this
Court at the City of
Washington, D.C., on October 07, 2024.*

Julio A. Castillo
JULIO A. CASTILLO
Clerk of the Court

Issued By:

David Chu - Director, Membership
District of Columbia Bar Membership

*For questions or concerns, please contact the D.C. Bar Membership Office at 202-626-3475 or email
memberservices@dcbar.org.*

1. The first part of the document discusses the importance of maintaining accurate records of all transactions and activities. It emphasizes that this is essential for ensuring transparency and accountability in the organization's operations.

2. The second part of the document outlines the various methods and tools used to collect and analyze data. It highlights the need for consistent data collection procedures and the use of advanced analytical techniques to derive meaningful insights from the data.

3. The third part of the document focuses on the role of technology in data management and analysis. It discusses how modern software solutions can streamline data collection, storage, and processing, thereby improving efficiency and reducing the risk of errors.

4. The fourth part of the document addresses the challenges associated with data security and privacy. It stresses the importance of implementing robust security measures to protect sensitive information and ensure compliance with relevant regulations.

5. The fifth part of the document provides a summary of the key findings and recommendations. It concludes that a comprehensive data management strategy is crucial for the organization's success and that ongoing monitoring and improvement are necessary to stay ahead of the competition.



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

December 31, 2024

The Honorable Jenny Abbott Kitchings
Clerk of Court
P.O. Box 11629
Columbia, SC 29211

RE: Skylar Blume, et al. v. Starbucks Corporation & Melissa Morris

Appellate Case No: 2023-001506

Dear Ms. Kitchings:

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

Sincerely,

Tina Bryant
Manager

cc: Charlotte H. Schwartz
Matthew Ozment

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In The Court of Appeals

APPEAL FROM ANDERSON COUNTY
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Jonathan Hudson, Natalie Mann, Mya Ourada,
Braden Terrill, & Aneil Thripathi,.....Respondent.

v.

Starbucks Corporation & Melissa Morris,.....Appellant.

PROOF OF SERVICE

I hereby certify that pursuant to the Supreme Court Order 2022-05-06-04, the Motion in Support of the *Pro Hac Vice* Application of Charlotte H. Schwartz along with a copy of her Verified Application of Admission and December 31, 2024 letter from the Office of Bar Admissions confirming receipt of the Verified Application of Admission was served via electronic mail on January 9, 2025, to the following individuals.

Blake T. Williams
C. Mitchell Brown
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1320 Main Street, 17th Floor
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William Harrell Foster, III
Benjamin Tradd Hepner
Katie Elizabeth Towery
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bhepner@littler.com

ktowery@littler.com

Attorneys for Appellant Starbucks Corporation

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hstetson@turnerpadget.com

Attorneys for Appellant Melissa Morris

GROVE OZMENT, L.L.C.

/s/Matthew R. Ozment
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Greenville, South Carolina 29601
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VIA EMAIL AND U.S. MAIL

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211
ctappfilings@sccourts.org

Re: Skylar Blume et al. v. Starbucks Corporation, et al., Appellate Case No. 2023-001506

Dear Madam Clerk:

Enclosed for filing please find the Motion in Support of Pro Hac Vice Application of Charlotte H. Schwartz along with the Verified Application of Admission and verification of receipt of the same from the Office of Bar Admissions. The same is being mailed today along with the filing fee.

Thank you for your assistance in this matter.

Regards,

A handwritten signature in blue ink, appearing to read "M. Ozment", written over a horizontal line.

Matthew R. Ozment