

The Supreme Court of South Carolina

DANIEL E. SHEAROUSE
CLERK OF COURT

BRENDA F. SHEALY
CHIEF DEPUTY CLERK

POST OFFICE BOX 11330
COLUMBIA, SOUTH CAROLINA 29211
TELEPHONE: (803) 734-1080
FAX: (803) 734-0384

September 27, 2013

The Honorable Daniel E. Shearouse
Clerk of Court
South Carolina Supreme Court
Post Office Box 11330
Columbia, S.C. 29211

RE: Ashley II of Charleston, LLC v. PCS Nitrogen, Inc., et al
Appellate Case No. 2013-001766

Dear Mr. Shearouse:

I certify that the Office of Bar Admissions has received verified applications requesting Sandra Kaczmarczyk and John B. Williams be admitted *pro hac vice* in the above matter. The \$250 filing fee for each applicant has been paid.

Yours truly,

Gayle B. Watts/st
Deputy Clerk for Bar Admissions

GBW/st

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM DISTRICT COURT - CHARLESTON DIVISION
Margaret B. Seymour, District Court Judge

Case No. 2:05-cv-02782-MBS

Ashley II of Charleston, LLC, *Plaintiff – Appellee,*

v.

PCS Nitrogen, Inc., *Defendant and Third-Party Plaintiff – Appellant,*

Ross Development Corporation; J. Holcombe Enterprises, L.P.; J. Henry Fair, Jr.; Robin Hood Container Express, Inc., Koninklijke DSM N.V.; DSM Chemicals of North America Inc.; Allwaste Tank Cleaning, Inc. f/k/a PSC Container Services, LLC n/k/a QualaServices, LLC,
Third-Party Defendants – Appellees

and

James H. Holcombe; City of Charleston, South Carolina,
Third-Party Defendants.

**MOTION IN SUPPORT OF APPLICATION FOR PRO
ADMISSION OF JOHN B. WILLIAMS**

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SERVICE

SEP 19 2013

S.C. SUPREME COURT

Wm. Howell Morrison
Haynsworth Sinkler Boyd, P.A.
134 Meeting Street, 4th Floor
Charleston, SC 29401
Ph. (843) 720-4405
Fax (843) 722-2266
hmorrison@hsblawfirm.com
Counsel for PCS Nitrogen, Inc.

Pursuant to Rule 404 of the South Carolina Appellate Court Rules, Wm. Howell Morrison of the firm of Haynsworth Sinkler Boyd, P.A., the undersigned counsel for the Defendant and Third-Plaintiff PCS Nitrogen, Inc. and a member of this Court, hereby moves for an Order admitting John B. Williams *pro hac vice* in this case as associate counsel for the Defendant and Third-Party Plaintiff PCS Nitrogen, Inc., together with the attached Verified Application for Admission *Pro Hac Vice* and Certificate of Good Standing, on the grounds showing contained in the declarations attached hereto.

Dated: September 18, 2013

Respectfully submitted,



Wm. Howell Morrison, SC #4106
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Counsel for PCS Nitrogen, Inc.

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Third-Party Defendants – Appellees

and

James H. Holcombe; City of Charleston, South Carolina
Third-Party Defendants.

CERTIFICATE OF SERVICE

This is to certify that on September 18, 2013, I served a copy of the foregoing Motion in Support of Application for Pro Hac Vice Admission of John B. Williams upon the following attorneys via United States mail, first class postage prepaid, as addressed below:

RECEIVED

SEP 23 2013

S.C. SUPREME COURT

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Fax (843) 722-2266
hmorrison@hsblawfirm.com
Counsel for PCS Nitrogen, Inc.

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below: (List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

N/A

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court, date):

N/A

7. Applicant never has had any application for admission pro hac vice in this or any other jurisdiction denied or any pro hac vice admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

N/A

8. Applicant never has had any certificate or privilege to appear and practice before any administrative body suspended or revoked, except as provided below (give particulars, e.g., date, administrative body, date of suspension and reinstatement):

N/A

9. Local counsel or record associated with applicant in this case is Wm. Howell Morrison, of the

Haynsworth, Sinkler, Boyd, P.A. law firm, which has offices at:

134 Meeting Street, 4th Floor

Street Address

Charleston

Charleston

S.C.

29401

City

County

State

Zip Code

843-722-3366

Telephone

If applicable list all other firms/attorneys you are associated with in this matter

Sandra Kaczmarczyk Alton Associates PLLC

10. Applicant has previously filed an application to appear pro hac vice in the following South Carolina cases (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).

Ashley II of Charleston, L.L.C. v. PCS Nitrogen, Inc., No. 2:05-2782-MBS

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant respectfully requests to be admitted to practice in the above named court for this case only.

DATED THIS

17th

day of

SEPTEMBER, 2013

APPLICANT

VERIFICATION

STATE OF District of Columbia)

COUNTY OF City of Washington)

I, John B. Williams, 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.

[Signature]
APPLICANT/AFFIANT

Subscribed and sworn to before me this 17th day of September, 20 13

Monica V. Woods

Notary Public for the ^{District}State of Columbia

My Commission Expires: April 30, 2015

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 18th day of September, 20 13

[Signature]
LOCAL COUNSEL OF RECORD

CERTIFICATE OF SERVICE

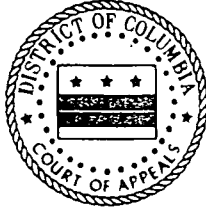
I hereby certify that I have served a copy of this application upon the South Carolina

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 18th day of Sept, 20 13

[Signature]
APPLICANT/AFFIANT

Bar Information for John Buchanan Williams

Court	Date of Admission
District of Columbia	12/18/78
U.S. District Court for the District of Columbia	1979
U.S. District Court for the Eastern District of Wisconsin	10/09/2007
U.S. Court of Appeals for the District of Columbia Circuit	04/24/1981
U.S. Supreme Court	1986
U.S. Court of Appeals for the First Circuit	1991
U.S. Court of Appeals for the Third Circuit	1991
U.S. Court of Appeals for the Fourth Circuit	1995
U.S. Court of Appeals for the Eleventh Circuit	05/06/2004
U.S. Court of Appeals for the Federal Circuit	1995



District of Columbia Court of Appeals
Committee on Admissions
430 F Street, N.W. — Room 123
Washington, D. C. 20001
202 / 879-2710

I, JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, do hereby certify that

JOHN B WILLIAMS

was on **DECEMBER 18, 1978** duly qualified and admitted 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 **SEPTEMBER 11, 2013**.

JULIO A. CASTILLO
Clerk of the Court

By: 
Deputy Clerk