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Feb 18 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas

George M. McFaddin, Jr., Circuit Court Judge

Appellate Case No. 2024-001363

Sarah Rock,

Appellant,

v.

Dog Daze of Charleston, LLC
and Charlie Freeman,

Respondents.

MOTION FOR *PRO HAC VICE* ADMISSION OF CHRISTIAN SUAREZ

Amicus Curiae, Animal Legal Defense Fund (“ALDF”), moves for the admission, *pro hac vice*, of Christian Suarez of ALDF, for the purposes of representation of ALDF in this matter. This motion is supported by the Application for Admission Pro Hac Vice (Exhibit “A”) and the Certificate of Good Standing (Exhibit “B”).

WHEREFORE, ALDF requests Christian Suarez of Animal Legal Defense Fund be admitted for the purposes of representing Amicus Curiae ALDF in this action on their behalf.

Respectfully submitted,

S/ Daniel R. Fuerst

Daniel R. Fuerst (S.C. Bar No. 102522)

MOORE & VAN ALLEN PLLC

78 Wentworth Street

P.O. Box 22828

Charleston, South Carolina 29413-2828

Telephone: (843) 579-7000
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danielfuerst@mvalawc.com

*Attorney for Amicus Curiae
Animal Legal Defense Fund*

February 18, 2025
Charleston, South Carolina

EXHIBIT A

**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.

Sarah Rock	Appellate Case No.:2024-001363	SC Court of Appeals
Plaintiff	Case No.	Tribunal
vs.		
Dog Daze of Charleston, LLC and Charlie Freeman	Mailing Address of Tribunal:	PO Box 11629
Defendant		Columbia, South Carolina 29211

Comes now Christian Suarez, applicant herein, and respectfully represents the following:

1. Applicant resides at:
600 Rainbow Dr Apt 175
 Street Address
Mountain View Santa Clara CA 94041
 City County State Zip Code
559-798-8088
 Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of)
Animal Legal Defense Fund, with offices at
525 E. Cotati Avenue
 Street Address
Cotati Sonoma California 94931
 City County State Zip Code
(707) 795-2533 ext. 1314 csuarez@aldf.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
Animal Legal Defense Fund 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 12/10 of 2023, 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 California 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.

102522

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 10th day of February, 20 25

Christian Suarez
APPLICANT

VERIFICATION

STATE OF California)

COUNTY OF Santa Clara)

I, Christian Suarez, 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.

Christian Suarez
APPLICANT/AFFILIANT

Subscribed and sworn to before me this 10th day of February, 20 25

(Notary Signature)

Notary Public for the State of California

My Commission Expires: _____

See Attached CA Certificate
Acknowledgement
Yurat

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 11 day of February, 20 25

[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

11th day of February, 20 25

Janet B. Donahue

CALIFORNIA JURAT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document, to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

STATE OF CALIFORNIA }

COUNTY OF Santa Clara }

Subscribed and sworn to (or affirmed) before me on this 10th day of February, 2025
Date Month Year

by Christian Suarez

Name of Signers

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature: Patricia Mae Hornback
Signature of Notary Public



Seal
Place Notary Seal Above

OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or fraudulent attachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: _____

Document Date: _____

Number of Pages: _____

Signer(s) Other Than Named Above: _____

EXHIBIT B

THE STATE BAR OF CALIFORNIA CERTIFICATE OF STANDING

February 6, 2025

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, CHRISTIAN SUAREZ, #353045 was admitted to the practice of law in this state by the Supreme Court of California on December 10, 2023 and has been since that date, and is at date hereof, an ACTIVE licensee of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA



Lea Randrup
Custodian of Records

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
George M. McFaddin, Jr., Circuit Court Judge

Appellate Case No.: 2024-001363
Case No. 2022-CP-10-05585

Sarah Rock, Appellant,

v.

Dog Daze of Charleston, LLC
And Charlie Freeman, Respondents.

PROOF OF SERVICE

This is to certify that I have this day served counsel for the parties in the foregoing matter with a copy of Animal Legal Defense Fund’s (ALDF) *Motion for Pro Hac Vice Admission of Christian Suarez* by depositing a copy of it in the United States Mail, postage pre-paid and via e-mail addressed to the parties as follows:

Frederick Elliott Quinn, IV (SC Bar No. 100450)
Michael J. Jordan (SC Bar No. 74902)
The Steinberg Law Firm, LLP
3955 Faber Place Drive, Suite 300
North Charleston, SC 29405
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*Attorneys for Respondents Dog Daze of Charleston, LLC
And Charlie Freeman*

s/ Daniel R. Fuerst

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DanielFuerst@mvalaw.com

*Attorneys for Amicus Curiae
Animal Legal Defense Fund*

February 18, 2025
Charleston, South Carolina

February 18, 2025

Moore&VanAllen

VIA E-FILING

Hon. Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211
ctappfilings@sccourts.org

Daniel Fuerst
Attorney at Law

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Charleston, SC 29401-1428

Mailing Address:
Post Office Box 22828
Charleston, SC 29413-2828

RE: *Sarah Rock v. Dog Daze of Charleston, LLC and Charlie Freeman*
Appellate Case No.: 2024-001363
MVA File No.: NB7000.001514

Dear Ms. Kitchings:

With regard to the above-referenced matter, please accept the enclosed *Motion for Pro Hac Vice Admission* for filing. The required filing fee in the amount of \$50.00 is being mailed to the Court under separate cover.

By copy of this letter, I am serving the parties' attorneys with a copy for the Motion for Pro Hac Vice Admission.

Thank you for your assistance in this matter. If you should have any questions or concerns, please don't hesitate to contact me.

Sincerely,

MOORE & VAN ALLEN PLLC

S/ Daniel R. Fuerst
Daniel R. Fuerst

DRF/jbd

Enclosures: As Stated.

cc: **VIA EMAIL ONLY**
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