

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of the Common Pleas

Edward W. Miller, Circuit Court Judge
G.D. Morgan, Jr., Circuit Court Judge

Appellate Case No. 2024-002191
Civil Action No. 2022-CP-23-05612

Lakeview Loan Servicing, LLC
and LoanCare LLC,Appellants-Defendants,

v.

Andrew E. Lewis,
.....Respondent-
Plaintiff.

MOTION FOR PRO HAC VICE ADMISSION OF KATHRYN L. ENDER

Attorney Bernie W. Ellis, an attorney admitted to practice before this Court, hereby moves the Court to admit Kathryn L. Ender pro hac vice, and states as follows:

1. Attached as **Exhibit A** and incorporated by reference is the verified Application of Kathryn L. Ender setting forth the qualifications required by this Court for admission pro hac vice.

2. Attached as **Exhibit B** and incorporated by reference is a Certificate of Good Standing certifying Kathryn L. Ender's good standing before the Florida Bar certifying good standing with the Florida Supreme Court.

3. Under Rule 404(e), SCACR, a copy of the Application of Kathryn L. Ender and admission fee of \$250 were submitted to the South Carolina Supreme Court Office of Bar Admissions.

4. Therefore, this Court is respectfully moved to admit Kathryn L. Ender pro hac vice, to be associated with movant.

DATED: May 8, 2025.

Respectfully Submitted,

BURR & FORMAN, LLP

/s/ Bernie W. Ellis _____

Bernie W. Ellis (SC Bar No. 64841)

Post Office Box 447

Greenville, SC 29602

Tel. (864) 271-4940

Fax. (864) 271-4015

bellis@burr.com

*Counsel for Lakeview Loan Servicing, LLC
and LoanCare, LLC*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing Motion has been duly served on Appellee by depositing a copy of it in the United States Mail, postage prepaid, on May 8, 2025, and via electronic mail addressed to Appellee's attorneys of record at the addresses set forth below:

Townes B. Johnson III
Townes B. Johnson III, LLC
Post Office Box 9246
Greenville, South Carolina 29604
tjohnson@sc.legal
filing.sc.legal@gmail.com

Christian H. Thorndike
Townes B. Johnson III, LLC
Post Office Box 9246
Greenville, South Carolina 29604
cthordike@sc.legal

BURR & FORMAN, LLP
/s/ Bernie W. Ellis
Bernie W. Ellis (SC Bar No. 64841)
Post Office Box 447
Greenville, SC 29602
Tel. (864) 271-4940
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bellis@burr.com

*Counsel for Lakeview Loan Servicing, LLC
and LoanCare, LLC*

**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.

Andrew E. Lewis	2024-002191	South Carolina Court of Appeals
Plaintiff	Case No.	Tribunal

vs.

Lakeview Loan Servicing, LLC & LoanCare LLC	Mailing Address of Tribunal: Court of Appeals
Defendant	1220 Senate Street
	Columbia, SC 29201

Comes now Kathryn L. Ender, applicant herein, and respectfully represents the following:

1. Applicant resides at:
11369 SW 86 Lane

Street Address Miami	Miami-Dade	Florida	33173
City	County	State	Zip Code
305-215-8202			
Telephone			

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Dinsmore & Shohl LLP, with offices at 200 S. Biscayne Blvd., Ste. 2401

Street Address Miami	Miami-Dade	Florida	33131
City	County	State	Zip Code
786-957-1136	305-215-8202	786-957-1157	Katie.Ender@Dinsmore.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 Lakeview Loan Servicing, LLC & LoanCare LLC 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 April 8 of 2008, 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 Florida 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:
Florida	04/08/2008
11th Circuit Court of Appeals	01/08/2009
Southern District of Florida	01/23/2009
Middle District of Florida	04/25/2019
Eastern District of Wisconsin	04/02/2024

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.

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.

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 Bernie W. Ellis of the Burr & Forman, LLP law firm, which has offices at:

Post Office Box 447

<u>Street Address</u>	<u>Greenville</u>	<u>Greenville</u>	<u>South Carolina</u>	<u>29602</u>
<u>City</u>	<u>864-271-4940</u>	<u>County</u>	<u>State</u>	<u>Zip Code</u>
<u>Primary Telephone</u>		<u>Cell Phone</u>	<u>864-271-4015</u>	<u>bellis@burr.com</u>
			<u>Fax Number</u>	<u>Email Address</u>

64841

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.

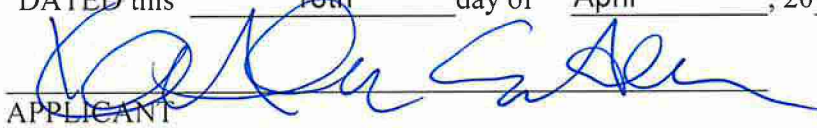
No.

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 18th day of April, 2025


APPLICANT

VERIFICATION

STATE OF Florida)

COUNTY OF Miami-Dade)

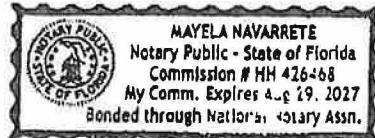
I, Kathryn L. Ender, do hereby swear or affirm under penalty of perjury that I am the applicant in the above-styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and 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.

Kathryn L. Ender
APPLICANT/AFFIANT

Subscribed and sworn to before me this 18th day of April, 20 25

[Signature]
(Notary Signature)

Notary Public for the State of Florida
My Commission Expires: 8-29-2027



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 23rd day of April, 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 ~~24~~ 18th day of ~~April~~ May, 20 25

Kathryn Ender

Exhibit B

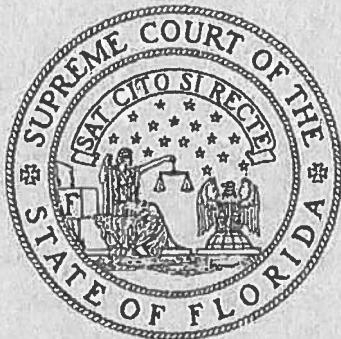
Supreme Court of Florida

Certificate of Good Standing

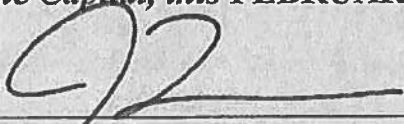
I, JOHN A. TOMASINO, Clerk of the Supreme Court of the State of Florida, do hereby certify that

KATHRYN LEE ENDER

was admitted as an attorney and counselor entitled to practice law in all the Courts of the State of Florida on APRIL 8, 2008, is presently in good standing, and that the private and professional character of the attorney appears to be good.



WITNESS my hand and the Seal of the Supreme Court of Florida at Tallahassee, the Capital, this FEBRUARY 28, 2025.



Clerk of the Supreme Court of Florida