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Jun 23 2025

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In The Supreme Court

IN THE ORIGINAL JURISDICTION
OF THE SUPREME COURT

The Methodist Church of Simpsonville, Jackson Grove Methodist Church, Calhoun Falls Methodist Church, Good Shepherd Methodist Church, Trinity Methodist Church of Lancaster, Aldersgate Methodist Church, Boiling Springs Methodist Church, Fort Lawn Methodist Church, Panola Methodist Church, Dickson Methodist Church, Heidi Meek Medlin, and Michael Smith Petitioners,

v.

The South Carolina Conference of the United Methodist Church, Bishop Leonard E. Fairley, Rev. Cathy Mitchell, Rev. Fran Elrod, Rev. Steve Brown, Rev. Terry Fleming, Rev. Telley Gadson, Rev. Anthony Hodge, Rev. Chris Lollis, Rev. Ken Nelson, Rev. Steve Patterson, Jr., and Rev. Jeffrey Salley Respondents.

**MOTION IN SUPPORT OF
PRO HACE VICE ADMISSION OF
DAVID C. GIBBS, III**

James Bannister, Esquire, counsel for Plaintiffs, Jackson Grove Methodist Church, et al., 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 David C. Gibbs, III, an attorney admitted and authorized to practice law in the highest court of the State of Florida, 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 David C. Gibbs, III 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.

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that David C. Gibbs, III, Esquire 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.

BANNISTER, WYATT & STALVEY, LLC.

By: /s/ James W. Bannister

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June
April 20, 2025
Greenville, South Carolina