

VERIFIED APPLICATION FOR ADMISSION PRO HAC VICE Jun 23 2025  
IN THE STATE OF SOUTH CAROLINA

S.C. SUPREME COURT

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>The Methodist Church of Simpsonville et al</u> Plaintiff	<u>2025-000712</u> Case No.	The State of South Carolina in the Supreme Court – In the original jurisdiction of the Supreme Court <u>Tribunal</u>
vs.		
<u>The South Carolina Conference of the United Methodist Church, et al.</u> Defendant.	Mailing Address of Tribunal:	<u>1231 Gervais Street</u> <u>Columbia, SC 29201</u>

Comes now David C. Gibbs, III, applicant herein, and respectfully represents the following:

1. Applicant resides at:  
19810 Gulf Blvd. #6  
 Street Address  
Indian Shores Pinellas Florida 33785  
 City County State Zip Code  
727-362-3700  
 Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) National Center for Life and Liberty, with offices at 13790 Roosevelt Blvd., Suite A  
 Street Address  
Clearwater Pinellas Florida 33762  
 City County State Zip Code  
727-362-3700 727-408-2200 727-398-3907 dgibbs@gibbsfirm.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 Jackson Grove Methodist Church, 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 November of 1993, 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:
SEE ATTACHED EXHIBIT	

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

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 James Bannister, Esq. of the Bannister, Wyatt & Stalvey, LLC., law firm, which has offices at:

24 Cleveland Street, Suite 100

Street Address	Greenville	Greenville	SC	29601
City	Greenville	County	State	Zip Code
Primary Telephone	864-298-0084	Cell Phone	864-567-9637	Fax Number
			864-298-0146	Email Address
				<u>jbannister@bannisterwyatt.com</u>

8895  
 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 – (1) Victory Baptist Church vs. Terry Woodside, active litigation, 5/2/24, Bill O’Connor; application granted. (2) John H. Glover e a. v. Benjamin Glover; Case No: 2017-CP-07-01973; status “closed”; 4/13/18; Capers G. Barr, III and application was granted.

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 25<sup>th</sup> day of April, 2025

David C. Goble III  
APPLICANT

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S.C. SUPREME COURT

VERIFICATION

STATE OF FLORIDA )

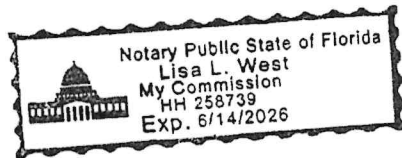
COUNTY OF PINELLAS )

I, David C. Gibbs, III, 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.

David C Gibbs III
APPLICANT/AFFIANT

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

Lisa L West
(Notary Signature)



Notary Public for the State of Florida

My Commission Expires: 6/14/26

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 June, 20 25

James Bannister
LOCAL COUNSEL OF RECORD - JAMES BANNISTER

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 day of , 20 25

David C Gibbs III
DAVID C. GIBBS, III

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Jun 23 2025

S.C. SUPREME COURT



## The Florida Bar

651 East Jefferson Street  
Tallahassee, FL 32399-2300

Joshua E. Doyle  
Executive Director

850/561-5600  
www.FLORIDABAR.org

State of Florida )

County of Leon )

In Re: 0992062  
David Charles Gibbs III  
Gibbs Law Firm, P.A.  
PO Box 5076  
Largo, FL 33779-5076

I CERTIFY THE FOLLOWING:

I am the custodian of membership records of The Florida Bar.

Membership records of The Florida Bar indicate that The Florida Bar member listed above was admitted to practice law in the state of Florida on **November 18, 1993**.

The Florida Bar member above is an active member in good standing of The Florida Bar who is eligible to practice law in the state of Florida.

Dated this 25th day of **April, 2025**.

Cynthia B. Jackson, CFO  
Administration Division  
The Florida Bar

PG:R10  
CTM-341401



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S.C. SUPREME COURT

**ATTORNEY DAVID C. GIBBS III BAR/COURT ADMISSIONS**

<b><u>Court</u></b>	<b><u>Bar Number</u></b>	<b><u>Date Admitted</u></b>
Florida Supreme Court	0992062	November 11, 1993
Texas Supreme Court	24026685	September 14, 2000
Colorado Supreme Court	025887	September 19, 1995
Minnesota Supreme Court	0253613	April 7, 1995
North Dakota Supreme Court	05310	September 19, 1995
Ohio Supreme Court	0078932	May 10, 2005
District of Columbia Court of Appeals	448476	November 3, 1995
Tennessee Supreme Court	008899	May 20, 2008
Michigan	P72917	August 6, 2009
United States Supreme Court		October 13, 2000
U. S. District Court for the Northern District of Florida		April 25, 1997
U. S. District Court for the Middle District of Florida		November 7, 1995
U. S. District Court for the Southern District of Florida		April 25, 1997
U. S. District Court for the Northern District of Illinois	90785119	January 18, 2001
U. S. District Court for the Eastern District of Michigan		August 30, 2013
U. S. District Court for the Eastern District of Texas		January 22, 2014
U. S. District Court for the Northern District of Texas		July 8, 2013

First Circuit Court of  
Appeals, Boston, MA

June 26, 2008

Second Circuit Court of  
Appeals, New York, NY

February 15, 2012

Third Circuit Court of  
Appeals, Philadelphia, PA

September 28, 2018

Fourth Circuit Court of  
Appeals, Richmond, VA

April 28, 2008

Seventh Circuit Court of  
Appeals, Chicago, IL

May 31, 2005

Ninth Circuit Court of  
Appeals, San Francisco, CA

July 13, 1998

Eleventh Circuit Court of  
Appeals, Atlanta, GA

July 30, 1997



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S.C. SUPREME COURT

# 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

May 30, 2025

The Honorable Patricia A. Howard  
Clerk of Court, Supreme Court of South Carolina  
1231 Gervais Street  
Columbia, S.C. 29201

RE: The Methodist Church of Simpsonville, et al. v. The South Carolina Conference of the  
United Methodist Church, et al.

Case No.: 2025-000712

Dear Ms. Howard:

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

Sincerely,

M.J. Thames  
Bar Admissions Coordinator

cc: David C. Gibbs III  
James Bannister

BannisterWyatt&Stalvey.LLC

JUN 5 2025

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