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**Aug 07 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM THE ADMINISTRATIVE LAW COURT  
Ralph King Anderson, III, Chief Administrative Law Judge

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Appellate Case No. 2024-000013  
Trial Court Case No. 19-ALJ-17-0416-CC

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Tractor Supply Company..... Appellant,

v.

South Carolina Department of Revenue ..... Respondent.

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**MOTION FOR ADMISSION PRO HAC VICE OF ERIK R. ZIMMERMAN**

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Pursuant to Rule 404 of the South Carolina Rules of Appellate Practice, Stephen M. Cox of Robinson, Bradshaw & Hinson, P.A., respectfully requests that the Court enter an Order permitting Erik R. Zimmerman to appear pro hac vice in this appeal as counsel for amici curiae the Chamber of Commerce of the United States of America and the South Carolina Chamber of Commerce and would show the Court as follows:

1. Erik R. Zimmerman is a member in good standing of the bar in the highest Court of the State of North Carolina, as well as the courts indicated in Mr. Zimmerman's Verified Application for Admission Pro Hac Vice. In addition,

Mr. Zimmerman is an attorney with the law firm of Robinson, Bradshaw & Hinson, P.A. and is counsel for amici curiae the Chamber of Commerce of the United States of America and the South Carolina Chamber of Commerce.

2. Mr. Zimmerman is handling this matter in association with Stephen M. Cox, who is a member in good standing of the South Carolina Bar.

3. This motion is supported by the attached Verified Application for Admission Pro Hac Vice of Erik R. Zimmerman, a copy of which has been served on the South Carolina Supreme Court Office of Bar Admission, along with a \$250 check made payable to the South Carolina Supreme Court.

WHEREFORE, the movant prays for an order of this Court permitting the appearance of Erik R. Zimmerman pro hac vice in this appeal for amici curiae the Chamber of Commerce of the United States of America and the South Carolina Chamber of Commerce.

s/ Stephen M. Cox  
Stephen M. Cox  
S.C. Bar No. 12263  
ROBINSON, BRADSHAW & HINSON, P.A.  
202 E. Main Street, Suite 201  
Rock Hill, South Carolina 29730  
(803) 325-2900  
scox@robinsonbradshaw.com

Dated: August 7, 2025

Attorney for Amici Curiae

**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.

<u>Tractor Supply Company</u> Plaintiff	<u>2024-000013</u> Case No.	<u>South Carolina Court of Appeals</u> Tribunal
vs.	Mailing Address of Tribunal:	<u>P.O. Box 11629</u>
<u>South Carolina Department of Revenue</u> Defendant		<u>Columbia, SC 29211</u>

Comes now Erik R. Zimmerman, applicant herein, and respectfully represents the following:

1. Applicant resides at:

207 Graylyn Dr.  
Street Address  
Chapel Hill                      Orange                      North Carolina                      27516  
City                                      County                                      State                                      Zip Code  
919-434-8440  
Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of)

Robinson, Bradshaw & Hinson, P.A., with offices at  
1450 Raleigh Road, Suite 100

Street Address  
Chapel Hill                      Orange                      NC                      27517  
City                                      County                                      State                                      Zip Code  
919-328-8800                      919-434-8440                      \_\_\_\_\_                      ezimmerman@rbh.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

The Chamber of Commerce of the United States of America and the South Carolina Chamber of Commerce 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 28<sup>th</sup> of March, 2016, 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 North Carolina 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:
U.S. Supreme Court	08/10/2015
U.S. Court of Appeals for the Second Circuit	09/09/2011
U.S. Court of Appeals for the Third Circuit	12/14/2020
U.S. Court of Appeals for the Fourth Circuit	05/12/2009
U.S. Court of Appeals for the Sixth Circuit	04/15/2011
U.S. Court of Appeals for the Seventh Circuit	12/04/2023
U.S. Court of Appeals for the Ninth Circuit	10/18/2022
U.S. Court of Appeals for the D.C. Circuit	08/15/2012
U.S. District Court for the Eastern District of North Carolina	11/10/2016
U.S. District Court for the Middle District of North Carolina	12/16/2016
U.S. District Court for the Western District of North Carolina	12/16/2016
District of Columbia	11/7/2008
Maryland	12/12/2007
North Carolina	3/28/2016

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 Stephen M. Cox of the Robinson, Bradshaw & Hinson, P.A. law firm, which has offices at:

600 S. Tryon Street, Suite 2300  
Street Address

Charlotte  
City

Mecklenburg  
County

NC  
State

28202  
Zip Code

(704) 377-2536  
Primary Telephone  
12263

803-984-3757  
Cell Phone

\_\_\_\_\_  
Fax Number

scox@rbh.com  
Email Address

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.

- South Carolina Supreme Court Case No. 2022-001574, *Stephen R. Edwards, individually and as personal representative of the Estate of Steven Redfearn Steward v. Scapa Waycross, Inc.* Case is closed. Application date: June 15, 2023. Local counsel: Stephen M. Cox of Robinson, Bradshaw & Hinson, P.A. Application was granted on July 3, 2023.
- South Carolina Supreme Court Case No. 2024-000625, *Amazon Services, LLC v. South Carolina Department of Revenue.* Case is pending. Application date: May 15, 2024. Local counsel: Stephen M. Cox of Robinson, Bradshaw & Hinson, P.A. Application was granted on June 4, 2024 .

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 4th day of August, 2025

  
\_\_\_\_\_  
APPLICANT

**VERIFICATION**

STATE OF NORTH CAROLINA )

COUNTY OF ORANGE )

I, Erik R. Zimmerman, 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.

[Signature]  
APPLICANT/AFFILIANT

Subscribed and sworn to before me this 4th day of August, 20 25

[Signature]  
(Notary Signature)



Notary Public for the State of North Carolina

My Commission Expires: 4/17/28

**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 4th day of August, 2025

[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 4th day of August, 20 25

[Signature]  
APPLICANT/AFFILIANT

# Supreme Court OF THE STATE OF NORTH CAROLINA



I, Grant E. Buckner, Clerk of the Supreme Court of North Carolina, do hereby certify that on March 28, 2016, license to practice as an Attorney and Counselor at Law in all the Courts of this State was issued by the North Carolina Board of Law Examiners to

**Erik R. Zimmerman**

according to the certified list of licentiates reported by the Secretary of said Board and filed in my office as required by statute.

To the date of this certificate, no order revoking said license has been filed with this Court and no order suspending same is in effect.

WITNESS my hand and the Seal of the Supreme Court of North Carolina at office in Raleigh, this July 30, 2025.

A handwritten signature in blue ink that reads "Grant E. Buckner".

Grant E. Buckner  
Clerk of the Supreme Court  
of the State of North Carolina

