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29924-0457

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RANDOLPH MURDAUGH, JR.
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(1927-2008)

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October 18, 2013

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NOV 06 2013

John E. Parker
Direct Dial: (803) 914-2004
Email: jparker@pmped.com

The Hon. Jenny Abbott Kitchings
Clerk of Court, S.C. Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

SC Court of Appeals

Re: Trumaine V. Moorer v. Norfolk Southern Railway Company
Court of Appeals Case No. 2012-212062

Dear Ms. Kitchings:

Enclosed for filing in your office, please find the following in reference to the above matter:

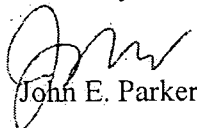
- 1) Original and one copy of Respondent's Motion for Admittance *Pro Hac Vice* for John Ashton Moss, proof of service, and check in the amount of \$25.00 for the filing fee; and
- 2) Original and one copy of the Application for Admission *Pro Hac Vice* and the original and one copy of certificate of good standing for John Ashton Moss.

Please return a filed stamped copy of the documents enclosed for filing in the envelope provided.

By copy of this letter, a copy of the documents enclosed for filing is being served on counsel of record.

With kind regards, I am

Sincerely,


John E. Parker

JEP/dlm

Enclosures

cc: Paul F. Tecklenburg, Esq./Rivers T. Jenkins, III, Esq.
John A. Moss, Esq.

101305



**PALMETTO
STATE BANK**
HAMPTON, S. C. 29924
67-259-532

**PETERS, MURDAUGH, PARKER,
ELTZROTH & DETRICK, P.A.**
ATTORNEY ACCOUNT
P.O. BOX 457
HAMPTON, SC 29924

10/18/2013

PAY TO THE
ORDER OF

S.C. Court of Appeals
Twenty-Five & No/100 Dollars
S.C. Court of Appeals
PO Box 11629
Columbia, SC 29211

25.00

\$

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MEMO

Truain Moorer v Norfolk Southern
File Motion for PHV

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S.C. COURT of Appeals

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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals
No. 2012-212062

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

DeAndrea G. Benjamin, Circuit Court Judge

Case No.: 2010-CP-40-5460

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SC Court of Appeals

Trumaine V. Moorner,

Respondent

v.

Norfolk Southern Railway Company,

Appellant

**RESPONDENT'S MOTION
FOR ADMITTANCE PRO HAC VICE**

The Respondent hereby moves the Court pursuant to Rule 404 SCACR for an order admitting attorney John Ashton Moss *pro hac vice* in this matter. John Ashton Moss was previously admitted *pro hac vice* in the case of Moorner v. Norfolk Southern Civil Action No.: 2008-CP-38-24 in the Court of Common Pleas for Orangeburg County on September 12, 2008. Respondent therefore files this motion for the purpose of having John Ashton Moss also represent him in the above captioned matter in the appeal of the Common Pleas case. Application for *pro hac vice* is being filed in this court along with the within motion.


WHEREFORE, pursuant to Rule 404 of the SCACR, the undersigned counsel, the South

Carolina attorney associated with John Ashton Moss in this matter, requests that this Court admit to practice, *pro hac vice*, for purposes of this case, attorney John Ashton Moss.

Respectfully Submitted,

PETERS, MURDAUGH, PARKER, ELTROTH
& DETRICK, P.A.

By: _____


John E. Parker, Esq.
101 Mulberry Street, East
Post Office Box 457
Hampton, South Carolina 29924
(803) 943-2111
ATTORNEY FOR APPELLANT

October 17, 2013

Hampton, SC

THE STATE OF SOUTH CAROLINA
In The Court of Appeals
No. 2012-212062

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

DeAndrea G. Benjamin, Circuit Court Judge

Case No.: 2010-CP-40-5460

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SC Court of Appeals

Trumaine V. Moorer,

Respondent

v.

Norfolk Southern Railway Company,

Appellant

CERTIFICATE OF SERVICE

This is to certify that I, **Donna L. Mann**, legal assistant with the Law Firm of Peters, Murdaugh, Parker, Eltzroth & Detrick, P.A., attorneys for the Appellant, have this date mailed via the U.S. Postal Service, a true and correct copy of the within *Motion for Admission Pro Hac Vice* with first class postage prepaid to:

Paul F. Tecklenburg, Esquire/Rivers T. Jenkins, Esquire
Tecklenburg & Jenkins, LLC
P.O. Box 20667
Charleston, SC 29413
ATTORNEYS FOR NORFOLK SOUTHERN

BY:



Donna L. Mann

October 18, 2013
Hampton, SC 29924

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below: (List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

Not applicable

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court, date):

Not applicable

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

Not applicable

8. Applicant never has had any certificate or privilege to appear and practice before any administrative body suspended or revoked, except as provided below (give particulars, e.g., date, administrative body, date of suspension and reinstatement):

Not applicable

9. Local counsel of record associated with applicant in this case is John E. Parker, of the Murdaugh, Parker, Eltzroth & Detrick, P.A. law firm, which has offices at:
101 Mulberry Street

Street Address

Hampton

Hampton

South Carolina

29924

City

County

State

Zip Code

(803) 943-2111

Telephone

If applicable list all other firms/attorneys you are associated with in this matter

Not applicable

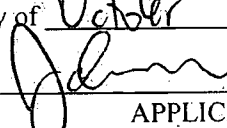
10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

--see attached addendum--

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant respectfully requests to be admitted to practice in the above named court for this case only.

DATED this 16 day of October, 2013.


APPLICANT

VERIFICATION

STATE OF GEORGIA)

COUNTY OF FULTON)

I, John Ashton Moss, 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.

[Signature]
APPLICANT/AFFIANT

Subscribed and sworn to before me this 10th day of October, 20 13.

[Signature]

Notary Public for the State of Georgia
My Commission Expires: 03/30/16

ANJANETTA D JONES
NOTARY PUBLIC, ROCKDALE COUNTY GEORGIA
MY COMMISSION EXPIRES MARCH 30, 2016

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 17 day of Oct, 20 13.

[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 18 day of October, 20 13.

[Signature]
APPLICANT/AFFIANT

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SC Court of Appeals

ADDENDUM

10. Laura Maggie Adams v. Norfolk Southern Railway Company; Settled; Application submitted: 12/20/06; Local Counsel: Scott Pfeiffer; Application granted.

Angel Vargas v. Norfolk Southern; Settled; Application submitted: 2/27/08; Local Counsel: John E. Parker; Application granted.

Shawn M. McMahon v. Norfolk Southern Railway Company; Settled; Application submitted: 7/2009; Local Counsel: John E. Parker; Application granted.

Trumaine Moorer v. Norfolk Southern Railway Company; Appeal active; Application submitted: 6/2010; Local Counsel: John E. Parker; Application granted.

STATE BAR OF GEORGIA



Lawyers Serving the Public and the Justice System

Mr. John Ashton Moss
Steel & Moss LLP
15 Piedmont Ctr, Suite 1560
3575 Piedmont Road, N.E.
Atlanta, GA 30305

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SC Court of Appeals

CURRENT STATUS: Active Member-Good Standing
DATE OF ADMISSION: 06/08/1991
BAR NUMBER: 526579
TODAY'S DATE: 10/09/2013

Listed below are the public disciplinary actions, if any, which have been taken against this member:

State Disciplinary Board Docket #	Supreme Court Docket #	Disposition	Date
N/A	N/A	N/A	N/A

The prerequisites for practicing law in the State of Georgia are as follows:

- Certified by the Office of Bar Admissions, either by Exam, or on Motion (Reciprocity).
- Sworn in to the Superior Court in Georgia, highest court required to practice law in Georgia.
- Enrolled with the State Bar of Georgia, arm of the Supreme Court of Georgia.

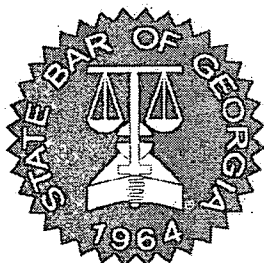
Attorneys licensed in Georgia and whose membership is current are eligible to practice law in Superior Court. Attorneys may, upon application, apply for admission to the Supreme, District and State Court of Appeals.

Under the privacy/confidentiality provision of the Bar Rule 4-221(d), any complaint against a member resolved prior to the filing and docketing of a disciplinary case in the Supreme Court is not a matter of public record, and may not be revealed without a waiver from the member. It is the policy of the State Bar of Georgia to answer any inquiry about a member by disclosing only those complaints that have been docketed in the Supreme Court. With respect to matters that are currently pending as active, undocketed cases, when an inquiry is received, the State Bar of Georgia shall not disclose the existence of those complaints. Such non-disclosure should not be construed to confirm the existence of confidential complaints since the vast majority of members in good standing are not the subjects of such confidential complaints.

This member is currently in "good standing" as termed and defined by State Bar Rule 1-204. The member is current in license fees and is not suspended or disbarred as of the date of this letter.

STATE BAR OF GEORGIA

Official Representative of the State Bar of Georgia



HEADQUARTERS

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Atlanta, Georgia 30303
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FAX (404) 527-8717
www.gabar.org

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P.O. Box 1390
Tifton, Georgia 31793-1390
(229) 387-0446 ■ (800) 330-0446
FAX (229) 382-7435

COASTAL GEORGIA OFFICE

18 E. Bay Street
Savannah, Georgia 31401-1225
(912) 239-9910 ■ (877) 239-9910
FAX (912) 239-9970

101305

**PETERS, MURDAUGH, PARKER,
ELTZROTH & DETRICK, P.A.**

ATTORNEY ACCOUNT
P.O. BOX 457
HAMPTON, SC 29924



**PALMETTO
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Trumain Moorer v Norfolk Southern
File Motion for PHV

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ATTORNEY ACCOUNT

S.C. Court of Appeals

10/18/2013

101305

Invoice Date

Invoice No.

Description

Amount

10/18/2013

Trumain Moorer v

File Motion for PHV

25.00

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