

**RECEIVED**

**Dec 31 2025**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Paul M. Burch, Circuit Court Judge

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Appellate Case No.: 2025-001338

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Ida Maeve Nordan, Randall Houston Nordan and Chip Eugene McCants, Jr.,  
by and through his parent and natural guardian, Ida Maeve Nordan ..... Appellants

v.

Sheriff of Richland County in his official capacity, and Half Moon Pictures  
LLC, Defendants,

of which Half Moon Pictures LLC ..... Respondent

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**MOTION FOR ADMISSION *PRO HAC VICE* OF MARY GOETZ**

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Pursuant to Rule 404 of the South Carolina Appellate Court Rules, Brian Critzer, of Wyche, P.A. respectfully moves this Court for an order permitting Mary Goetz to appear *pro hac vice* in the above-caption civil action for the sole purpose of representing Respondent Half Moon Pictures, LLC, and would show unto the Court as follows:

1. Mary Goetz is a member in good standing of the Bar of the Supreme Court of New York, and is a member of Davis Wright Tremaine, LLP, 1251 Avenue of the Americas, 21<sup>st</sup> Floor, New York, NY 10020.

2. Ms. Goetz requests to handle this matter in association with Wallace K. Lightsey and Brian Critzer, who are members in good standing of the South Carolina Bar.

3. The undersigned counsel has reached out to counsel for Appellant requesting consent to this *pro hac vice* admission, and the undersigned counsel has not received a response at the time of filing.

4. This Motion is supported by Ms. Goetz's Verified Application for Admission *Pro Hac Vice*, a copy of which has been submitted to the South Carolina Supreme Court Office of Bar Admissions together with a check in the amount of \$250.00 made payable to the South Carolina Supreme Court, and a certification from the South Carolina Supreme Court pursuant to Rule 404 of the South Carolina Appellate Court Rules.

Accordingly, the undersigned counsel requests that the Court enter an order permitting Mary Goetz's admission to practice before this Court *pro hac vice* in this action.

Respectfully submitted,

*s/ Brian Critzer*

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Wallace K. Lightsey (S.C. Bar No. 6476)

Brian Critzer (S.C. Bar No. 103159)

WYCHE, P.A.

200 East Broad Street, Suite 400

Greenville, SC 29601-2892

Phone: (864) 242-8207

wlightsey@wyche.com

bcritzer@wyche.com

Jeremy Chase\*  
DAVIS WRIGHT TREMAINE LLP  
1251 Avenue of the Americas, 21st Floor  
New York, NY 10020  
Phone: (212) 489-8230  
jeremychase@dwt.com

\*Admitted *pro hac vice*

*Attorneys for Respondent Half Moon Pictures,  
LLC*

December 31, 2025  
Columbia, South Carolina

South Carolina Supreme Court  
Office of Bar Admissions  
1231 Gervais Street  
Columbia, SC 29201  
<https://sbaradmissions.sccourts.org>



The Supreme Court of South Carolina  
Office of Bar Admissions

PATRICIA A. HOWARD  
CLERK OF COURT

T. KYLE TENNIS  
DEPUTY CLERK

KATHLEEN "TINA" BRYANT  
MANAGER, OFFICE OF BAR  
ADMISSIONS

POST OFFICE BOX 11330  
COLUMBIA, SOUTH CAROLINA  
29211  
TELEPHONE: (803) 734-1317  
FAX: (803) 734-0394

December 23, 2025

Mary Goetz  
1251 Avenue of the Americas, 21st floor  
New York, NY 10020

RE: Ida Maeve Nordan, Randall Houston Nordan and Chip Eugene McCants, Jr., by and through his parent and natural guardian, Ida Maeve Nordan, Appellants, v. Sheriff of Richland County in his official capacity, and Half Moon Pictures, LLC, Defendants, of which Half Moon Pictures, LLC is the Respondent.

Appellate Case No. 2025-001338

Dear Applicant:

I certify that the Office of Bar Admissions has received your application for admission pro hac vice in the above action. The \$250 admission fee has been paid.

Sincerely,

T. Kyle Tennis

Deputy Clerk

# Pro Hac Vice Application

Amendment Submitted on 12.23.2025

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## General Information

### Personal Information

Applicant First Name	Mary
Applicant Middle Name	
Applicant Last Name	Goetz
Applicant Suffix	
Applicant Business Address 1	1251 Avenue of the Americas, 21st floor
Applicant Business Address 2	
Applicant City	New York
Applicant State	New York
Applicant Zip Code	10020
Applicant County	New York
Applicant Primary Phone Number	2124024039
Applicant Cell Phone Number	null
Applicant Primary Email	tdesrosier@wyche.com

### Applicant Firm Information

Applicant Law Firm Name	Davis Wright Tremaine, LLP
Applicant Law Firm Address 1	1251 Avenue of the Americas, 21st Floor
Address 2	
City	New York
State	NY
Zip Code	10020
Applicant Law Firm County	New York
Applicant Law Firm Phone Number	2124024039
Applicant Law Firm Email	marygoetz@dwt.com

### Case Information

Plaintiff Name Ida Maeve Nordan, Randall Houston Nordan and Chip Eugene McCants, Jr., by and through his parent and natural guardian, Ida Maeve Nordan

Defendant Name Sheriff of Richland County in his official capacity, and Half Moon Pictures, LLC

Case Name Ida Meave Nordan, Randall Houston Nordan and Chip Eugene McCants, Jr., by and through his parent and natural guardian, Ida Maeve Nordan, Appellants vs. Sheriff of Richland County in his official capacity, and Half Moon Pictures LLC, Respondent

Case Number (Please include all zeros in case number) 2025-001338

Applicant Retained By Half Moon Pictures, LLC.

Tribunal South Carolina Court of Appeals

Tribunal Address 1 1220 Senate Street

Address 2

City Columbia

State South Carolina

Zip Code 29201

**Local Counsel Information**

Are you filing a pro hac vice application to appear in an arbitration, mediation, or alternative dispute resolution? No

**Please be aware that local counsel must be Rule 403 certified.**

Local Counsel First Name Robert

Local Counsel Last Name Critzer

Local Counsel Bar Number 103159

Local Counsel Law Firm Name Wyche, PA

Local Counsel Law Firm Address 1 200 East Broad Street, Suite 400

Address 2

City Greenville

State SC

Zip Code 29601

Local Counsel Law Firm County Greenville

Local Counsel Primary Phone Number 8642428207

Local Counsel Cell Phone Number 8037712442

Local Counsel Email bcritzer@wyche.com

**Jurisdictions/Courts**

**Jurisdictions/Courts**

**List all courts before which you have 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.**

**NOTE:** You will be required to upload **one** certificate of good standing dated within the last 90 days from the highest court of the District of Columbia or the State where the applicant regularly practices law.

**NOTE:** If you are filing a pro hac vice application to appear in an arbitration, mediation, or other alternative dispute resolution proceeding in South Carolina, the certificate of good standing you are required to upload must be from the jurisdiction where your pre-existing representation of a client is located.

Court Name	D.C. Court of Appeals
Jurisdiction	District of Columbia
Date Admitted	3-2020
Are you presently a member in good standing of the bar of this court?	Yes
Court Name	Appellate Division of the Supreme Court of the State of New York, First Judicial Department"
Jurisdiction	New York
Date Admitted	6-2025
Are you presently a member in good standing of the bar of this court?	Yes
Court Name	U.S. District Court
Jurisdiction	Southern District of New York
Date Admitted	9-2025
Are you presently a member in good standing of the bar of this court?	Yes
Court Name	U.S. District Court
Jurisdiction	Eastern District of New York
Date Admitted	9-2025
Are you presently a member in good standing of the bar of this court?	Yes
Court Name	U.S. Court of Appeals
Jurisdiction	Third Circuit
Date Admitted	2-2022
Are you presently a member in good standing of the bar of this court?	Yes
Court Name	U.S. Court of Appeals
Jurisdiction	Ninth Circuit
Date Admitted	3-2022
Are you presently a member in good standing of the bar of this court?	Yes
Court Name	U.S. Court of Appeals
Jurisdiction	D.C. Circuit

Date Admitted 11-2023

Are you presently a member in good standing of the bar of this court? Yes

Court Name U.S. Court of Appeals

Jurisdiction Second Circuit

Date Admitted 11-2025

Are you presently a member in good standing of the bar of this court? Yes

Are you presently subject to any suspension or disbarment proceedings, or been formally notified of any complaints pending before a disciplinary agency? No

**Prior Pro Hac Vice Applications**

**Prior Pro Hac Vice Applications**

Have you previously filed an application to appear Pro Hac Vice in any South Carolina cases? No

Have you ever had any application for admission Pro Hac Vice denied or any Pro Hac Vice admission revoked in this or any other jurisdiction? No

**NOTE:** You must upload a copy of any order of denial or revocation.

Have you ever had any certificate or privilege to appear and practice before any court or administrative body suspended or revoked? Yes

Jurisdiction District of Columbia

Date of Suspension/Revocation 7-2020

Date of Reinstatement (if any) 8-2020

Court or Administrative Body District of Columbia Bar

Explain Circumstances

I was admitted to the District of Columbia Bar in March 2020 and inadvertently failed to register within the required 90 days of my certification of admission. I was notified of a summary suspension for failure to register on July 28, 2020 and submitted my registration, registration fee, reinstatement request, and reinstatement fee to the D.C. Bar the following day on July 29, 2020. I received confirmation of my reinstatement on August 3, 2020, effective August 2, 2020. Other than that, I have never been censured, disbarred, or suspended from any bar or court in which I am admitted.

**Attestations**

**Attestations**

Applicant agrees to comply with the applicable statutes, law and rules of the State of South Carolina; be familiar with and comply with the South Carolina Rules of Professional Conduct. I Agree

Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct. I Consent

Type name in the box to sign electronically Mary Goetz

**Signed on this date: 12/15/2025 14:14:00**

Type in Date 12-15-2025

**VERIFICATION**

STATE OF NEW YORK

COUNTY OF NEW YORK

I, Mary Goetz, 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.

Mary Goetz  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 10<sup>th</sup> day of December, 20 25

Louanne B. Guisuraga  
(Notary Signature)

LOUANNE B. GUISURAGA  
NOTARY PUBLIC, STATE OF NEW YORK  
Registration No. 01GU0004082  
Qualified in Orange County  
Commission Expires March 27, 2027

Notary Public for the State of New York

My Commission Expires: March 27, 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 10<sup>th</sup> day of December, 20 25

R. Brian Critzer  
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 10th day of December, 20 25

R. Brian Critzer



*Appellate Division of the Supreme Court  
of the State of New York  
First Judicial Department*

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*I, Susanna M. Rojas, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, do hereby certify that*

*Mary Elizabeth Goetz*

*was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on June 9, 2025, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors at Law on file in this office, is duly registered with the Office of Court Administration, and according to the records of this Court is currently in good standing as an Attorney and Counselor-at-Law.*

*In Witness Whereof, I have hereunto set my hand in the City of New York on December 17, 2025.*



*Susanna M. Rojas*

*Clerk of the Court*



Supreme Court of the State of New York  
Appellate Division, First Department

DIANNE T. RENWICK  
PRESIDING JUSTICE

MARGARET SOWAH  
DEPUTY CLERK OF THE COURT

SUSANNA MOLINA ROJAS  
CLERK OF THE COURT

DOUGLAS C. SULLIVAN  
DEPUTY CLERK OF THE COURT

To Whom It May Concern

An attorney admitted to practice by this Court may request a certificate of good standing, which is the only official document this Court issues certifying to an attorney's admission and good standing.

An attorney's registration status, date of admission and disciplinary history may be viewed through the attorney search feature on [the website of the Unified Court System](#).

New York State does not register attorneys as active or inactive.

An attorney may request a disciplinary history letter from the [Attorney Grievance Committee of the First Judicial Department](#).

Bar examination history is available from the [New York State Board of Law Examiners](#).

Instructions, forms and links are available on [this Court's website](#).

Susanna Rojas  
Clerk of the Court

Revised October 2020

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**Dec 31 2025**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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Court of Common Pleas

Paul M. Burch, Circuit Court Judge

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Appellate Case No.: 2025-001338

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by and through his parent and natural guardian, Ida Maeve Nordan ..... Appellants

v.

Sheriff of Richland County in his official capacity, and Half Moon Pictures  
LLC, Defendants,

of which Half Moon Pictures LLC ..... Respondent

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**PROOF OF SERVICE**

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I, the undersigned attorney for Respondent Half Moon Pictures LLC, do hereby certify that I have served all counsel of record in this action with a true and correct copies of Motion for Admission Pro Hac Vice of Mary Goetz via electronic mail, pursuant to Supreme Court Order 2024-04-24-01 and a copy of that electronic mail is attached.

**Counsels for Appellants**

Eric S. Bland (SC Bar No. 64132)  
105 West Main Street, Suite D  
Lexington, South Carolina 29072  
T: 803.256.9664 | F: 803.256.3056  
[ericbland@blandrichter.com](mailto:ericbland@blandrichter.com)

Scott M. Mongillo (SC Bar No. 16574)  
Peoples Building  
18 Broad Street, Mezzanine Level

Charleston, South Carolina 29401  
T: 843.573.9900 | F: 843.573.0200  
[ronnie@blandrichter.com](mailto:ronnie@blandrichter.com)  
[scott@blandrichter.com](mailto:scott@blandrichter.com)

Respectfully submitted,

*s/Brian Critzer*

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Wallace K. Lightsey (S.C. Bar No. 6476)  
Brian Critzer (S.C. Bar No. 103159)  
WYCHE, P.A.  
200 East Broad Street, Suite 400  
Greenville, SC 29601-2892  
Phone: (864) 242-8207  
[wlightsey@wyche.com](mailto:wlightsey@wyche.com)  
[bcritzer@wyche.com](mailto:bcritzer@wyche.com)

Jeremy Chase (admitted *pro hac vice*)  
DAVIS WRIGHT TREMAINE LLP  
1251 Avenue of the Americas, 21st Floor  
New York, NY 10020  
Phone: (212) 489-8230  
[jeremychase@dwt.com](mailto:jeremychase@dwt.com)

*Attorneys for Respondent Half Moon  
Pictures LLC*

Columbia, South Carolina  
December 31, 2025

**From:** [Taisha Desrosier](#)  
**Sent:** Wednesday, December 31, 2025 2:06 PM  
**To:** 'Eric S. Bland'; 'Ronnie Richter'; 'Scott Mongillo'  
**Cc:** [Brian Critzer](#); [Wallace K. Lightsey](#); 'Goetz, Mary'; 'Chase, Jeremy'  
**Subject:** RE: Ida Maeve Nordan, Randall Houston Nordan and Chip Eugene McCants, Jr., by and through his parent and natural guardian, Ida Maeve Nordan v. Half Moon Pictures, LLC - Appellate Case No.: 2025-001338  
**Attachments:** 2025-12-31 Motion for Admission Pro Hac Vice.pdf

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Good afternoon,

Attached for service upon is a Motion for Admission *Pro Hac Vice* of Mary Goetz in the above case. This motion will be filed with the Court of Appeals this afternoon.

Thank you



**Taisha Desrosier | Wyche**

Litigation Paralegal

807 Gervais Street, Suite 301 | Columbia, SC 29201

Mailing Address: Post Office Box 12247 | Columbia, SC 29211

[tdesrosier@wyche.com](mailto:tdesrosier@wyche.com) | [www.wyche.com](http://www.wyche.com)

A [Lex Mundi](#) Member Firm