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Feb 23 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

The Honorable Ralph King Anderson, III, Administrative Law Judge

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Appellate Case No.: 2026-000221  
Docket No.: 24-ALJ-07-0232-CC

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South Carolina Department of Environmental Services and  
South Carolina Coastal Conservation League.....Respondents-Appellants,

v.

Rom Reddy.....Appellant-Respondent.

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**MOTION FOR ADMISSION *PRO HAC VICE*  
OF JEREMY TALCOTT**

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Appellant-Respondent Rom Reddy moves for the admission, *pro hac vice*, of Jeremy Talcott of Pacific Legal Foundation for the purposes of his representation of Appellant-Respondent in this matter. This motion is supported by the Application for Admission Pro Hac Vice (Exhibit “A”), the Certificate of Good Standing (Exhibit “B”), and the Certificate from the South Carolina Supreme Court Office of Bar Admissions verifying that the application has been received and the filing fee was paid (Exhibit “C”).

WHEREFORE, Appellant-Respondent requests Jeremy Talcott of Pacific Legal Foundation be admitted for the purposes of representing Appellant-Respondent in this action on his behalf.

Respectfully submitted,

*s/ E. Brandon Gaskins*

E. Brandon Gaskins (SC Bar No. 73274)

Moore & Van Allen PLLC

78 Wentworth Street

P.O. Box 22828

Charleston, SC 29413-2828

Telephone: (843) 579-7000

Email: [brandongaskins@mvalaw.com](mailto:brandongaskins@mvalaw.com)

*Attorney for Appellant-Respondent*

*Rom Reddy*

February 23, 2026

Charleston, South Carolina

# **EXHIBIT A**

# Pro Hac Vice Application

Amendment Submitted on 02.13.2026

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## General Information

### Personal Information

Applicant First Name	Jeremy
Applicant Middle Name	Brennan
Applicant Last Name	Talcott
Applicant Suffix	
Applicant Business Address 1	555 Capitol Mall, Suite 1290
Applicant Business Address 2	
Applicant City	Sacramento
Applicant State	California
Applicant Zip Code	95814
Applicant County	Sacramento
Applicant Primary Phone Number	916-419-7111
Applicant Cell Phone Number	null
Applicant Primary Email	jtalcott@pacificlegal.org

### Applicant Firm Information

Applicant Law Firm Name	Pacific Legal Foundation
Applicant Law Firm Address 1	555 Capitol Mall, Suite 1290
Address 2	
City	Sacramento
State	CA
Zip Code	95814
Applicant Law Firm County	Sacramento
Applicant Law Firm Phone Number	9164197111
Applicant Law Firm Email	jtalcott@pacificlegal.org

### Case Information

Plaintiff Name	South Carolina Department of Environmental Services and South Carolina Coastal Conservation League
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Defendant Name Rom Reddy

Case Name South Carolina Department of Environmental Services v. Reddy

Case Number (Please include all zeros in case number) 2026-000221

Applicant Retained By Appellant Rom Reddy

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 E. Brandon

Local Counsel Last Name Gaskins

Local Counsel Bar Number 73274

Local Counsel Law Firm Name Moore & Van Allen PLLC

Local Counsel Law Firm Address 1 78 Wentworth Street

Address 2 P.O. Box 22828

City Charleston

State SC

Zip Code 29413-2828

Local Counsel Law Firm County Charleston

Local Counsel Primary Phone Number 8435797000

Local Counsel Cell Phone Number 8034793394

Local Counsel Email brandongaskins@mvalaw.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	Supreme Court of California
Jurisdiction	California - state
Date Admitted	12-2016
Are you presently a member in good standing of the bar of this court?	Yes

Court Name	U.S. District Court, Central District of California
Jurisdiction	federal
Date Admitted	2-2018
Are you presently a member in good standing of the bar of this court?	Yes

Court Name	U.S. District Court, District of New Mexico
Jurisdiction	federal
Date Admitted	6-2024
Are you presently a member in good standing of the bar of this court?	Yes

Court Name	U.S. Court of Appeals, Ninth Circuit
Jurisdiction	federal
Date Admitted	12-2016
Are you presently a member in good standing of the bar of this court?	Yes

Court Name	U.S. Court of Appeals, Tenth Circuit
Jurisdiction	federal
Date Admitted	1-2025
Are you presently a member in good standing of the bar of this court?	Yes

Court Name	United States Supreme Court
Jurisdiction	federal
Date Admitted	2-2020
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
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**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
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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? No

**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 Jeremy Talcott

**Signed on this date: 02/12/2026 12:59:52**

Type in Date 2-12-2026

VERIFICATION

STATE OF CALIFORNIA )

COUNTY OF Orange )

I, Jeremy Talcott, 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.

Jeremy Talcott  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 10<sup>th</sup> day of February, 2026

\_\_\_\_\_  
(Notary Signature)

Notary Public for the State of \_\_\_\_\_

My Commission Expires: \_\_\_\_\_

**A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.**

State of California  
County of Orange  
Subscribed and sworn to (or affirmed) before me on this 10<sup>th</sup> day  
of February, 2024, by Jeremy Talcott

\_\_\_\_\_, proved to me on the basis  
of satisfactory evidence to be the person(s) who appeared before me.

Signature Charles David Jimenez (Seal)



**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 11<sup>th</sup> day of February, 20 26

E. B. M.  
LOCAL COUNSEL OF RECORD

# **EXHIBIT B**



# Supreme Court of California

JORGE E. NAVARRETE  
*Clerk and Executive Officer of the Supreme Court*

**CERTIFICATE OF THE CLERK OF THE SUPREME COURT**  
**OF THE**  
**STATE OF CALIFORNIA**

**JEREMY BRENNAN TALCOTT**

*I, JORGE E. NAVARRETE, Clerk and Executive Officer of the Supreme Court of the State of California, do hereby certify that JEREMY BRENNAN TALCOTT, #311490, was on the 1st day of December 2016 duly admitted to practice as an attorney and counselor at law in all the courts of this state, and is now listed on the Roll of Attorneys as a member of the bar of this state in good standing.*

*Witness my hand and the seal of the court  
on the 3rd day of February 2026.*

JORGE E. NAVARRETE  
*Clerk and Executive Officer of the Supreme  
Court*

By: \_\_\_\_\_

*L. Brooks, Senior Deputy Clerk*

# **EXHIBIT C**

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

February 17, 2026

Jeremy Brennan Talcott  
555 Capitol Mall, Suite 1290  
Sacramento, CA 95814

RE: South Carolina Department of Environmental Services and South Carolina Coastal Conservation League v. Rom Reddy

Appellate Case No. 2026-000221

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,

A handwritten signature in black ink that reads 'T. Kyle Tennis'.

T. Kyle Tennis

Deputy Clerk

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**PROOF OF SERVICE**

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This is to certify that I have this day served counsel for Respondents-Appellants South Carolina Department of Environmental Services and South Carolina Coastal Conservation League in the foregoing matter with a copy of *Appellant-Respondent Rom Reddy's Motion for Admission Pro Hac Vice of Jeremy Talcott* via electronic mail only, addressed as follows:

Bradley D. Churdar, Esq.  
Sallie P. Phelan, Esq.  
South Carolina Department of Environmental Services  
1362 McMillan Avenue, Suite 400  
Charleston, SC 29405  
[bradley.churdar@des.sc.gov](mailto:bradley.churdar@des.sc.gov)  
[sallie.phelan@des.sc.gov](mailto:sallie.phelan@des.sc.gov)

*Attorneys for Respondent-Appellant  
South Carolina Department of Environmental Services*

Leslie S. Lenhardt, Esq.  
Lauren Milton, Esq.  
South Carolina Environmental Law Project  
P.O. Box 1380  
Pawleys Island, SC 29585  
[leslie@scelp.org](mailto:leslie@scelp.org)  
[lauren@scelp.org](mailto:lauren@scelp.org)

*Attorneys for Respondent-Appellant  
South Carolina Coastal Conservation League*

*s/ E. Brandon Gaskins*  
\_\_\_\_\_  
E. Brandon Gaskins (SC Bar No. 73274)  
Moore & Van Allen PLLC  
78 Wentworth Street  
P.O. Box 22828  
Charleston, SC 29413-2828  
Telephone: (843) 579-7000  
Email: [brandongaskins@mvalaw.com](mailto:brandongaskins@mvalaw.com)

*Attorney for Appellant-Respondent  
Rom Reddy*

February 23, 2026

Charleston, South Carolina

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SC Court of Appeals

Moore & Van Allen

February 23, 2026

**VIA E-FILING**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211  
[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

**E. Brandon Gaskins**  
Attorney at Law

T 843 579 7038  
F 843 579 8738  
[brandongaskins@mvalaw.com](mailto:brandongaskins@mvalaw.com)

Moore & Van Allen PLLC

78 Wentworth Street  
Charleston, SC 29401-1428

Mailing Address:  
Post Office Box 22828  
Charleston, SC 29413-2828

**Re: South Carolina Department of Environmental Services and South Carolina Coastal Conservation League vs. Rom Reddy**  
**Docket No.: 24-ALJ-07-0232-CC**  
**Appellate Case No.: 2026-000221**  
**MVA File No.: 047825.000002**

Dear Ms. Kitchings,

With regard to the above-referenced matter, please accept the following for filing:

1. **Appellant-Respondent Rom Reddy's Motion for Admission *Pro Hac Vice* of Christopher Kieser and Proof of Service; and**
2. **Appellant-Respondent Rom Reddy's Motion for Admission *Pro Hac Vice* of Jeremy Talcott and Proof of Service.**

The required respective filing fees in the amount of \$50.00 for each motion are being mailed to the Court under separate cover.

By copy of this letter, I am serving Respondents-Appellants' attorneys with a copy of the Motions for Admission *Pro Hac Vice*. Thank you for your assistance in this matter. If you should have any questions or concerns, please feel free to contact me.

Sincerely,



E. Brandon Gaskins

EBG/lp

Enclosures: As Stated.

cc: **VIA EMAIL ONLY**  
Bradley D. Churdar, Esq.  
Sallie P. Phelan, Esq.  
Leslie S. Lenhardt, Esq.  
Lauren Milton, Esq.

Charlotte, NC  
Charleston, SC