

RECEIVED**Mar 25 2026**

S.C. SUPREME COURT

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

LATAVEIA ALLEN, *on behalf of herself and
all others similarly situated,*

Plaintiff,

v.

SRP FEDERAL CREDIT UNION,

Defendant.

Case No.: 1:24-cv-07476-CMC

NORMAN BLACK, *on behalf of himself and
all others similarly situated,*

Plaintiff,

v.

SRP FEDERAL CREDIT UNION,

Defendant.

Case No. 1:24-cv-07519-CMC

GE-QUOIA WHITFIELD, *on behalf of herself
and all others similarly situated,*

Plaintiff,

v.

SRP FEDERAL CREDIT UNION,

Defendant.

Case No. 1:24-cv-07537-CMC

ROSEMARY ORTIZ, *on behalf of herself and
all others similarly situated,*

Plaintiff,

v.

SRP FEDERAL CREDIT UNION,

Defendant.

Case No.: 1:24-cv-07671-CMC

<p>THERESA MCGRIER, <i>on behalf of herself and all others similarly situated</i>, Plaintiff,</p> <p>v.</p> <p>SRP FEDERAL CREDIT UNION, Defendant.</p>	<p>Case No.: 1:24-cv-07695-CMC</p>
<p>SHANNON DUNN, <i>on behalf of herself and all others similarly situated</i>, Plaintiff,</p> <p>v.</p> <p>SRP FEDERAL CREDIT UNION, Defendant.</p>	<p>Case No.: 1:25-cv-00210-CMC</p>
<p>RICKY CHASE, <i>on behalf of himself and all others similarly situated</i>, Plaintiff,</p> <p>v.</p> <p>SRP FEDERAL CREDIT UNION, Defendant.</p>	<p>Case No.: 1:25-cv-00312-CMC</p>

MOTION IN SUPPORT OF PRO HAC VICE APPLICATION

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that Tyler J. Bean be admitted *pro hac vice* in the above-captioned case as associate counsel. As local counsel, I understand that:

1. I will personally sign and include my District of South Carolina federal bar attorney identification number on each pleading, motion, discovery procedure, or other document that I serve or file in this court; and

2. All pleadings and other documents that I file in this case will contain my name, firm name, address, and phone number and those of my associate counsel admitted *pro hac vice*; and

3. Service of all pleadings and notices as required shall be sufficient if served upon me, and it is my responsibility to serve my associate counsel admitted *pro hac vice*; and

4. Unless excused by the court, I will be present at all pretrial conferences, hearings, and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.

5. Certification of Consultation (Local Civil Rule 7.02).

- Prior to filing this Motion, I conferred with opposing counsel who has indicated the following position as to this Motion: will likely oppose; does not intend to oppose
- Prior to filing this Motion, I attempted to confer with opposing counsel but was unable to do so for the following reason(s):
- No duty of consultation is required because the opposing party is proceeding *pro se*.

Poulin Willey Anastopoulo, LLC
Firm Name
32 Ann Street
Street Address or Post Office Box
Charleston, South Carolina 29403
City, State, Zip Code
(803) 222-2222
Telephone Number
paul.doolittle@poulinwilley.com
E-Mail Address

Paul J. Doolittle
Name of Local Counsel
/s/ Paul J.Doolittle
Signature of Local Counsel
Local Counsel for
Plaintiffs Lataveia Allen, Norman Black,
Ge-Quoia Whitfield, Rosemary Ortiz, Theresa
McGrier, Shannon Dunn, and Ricky Chase
District of South Carolina
Federal Bar Number: 6012

/s/ Karolan Ohanesian

Karolan Ohanesian, Fed ID 6056
Glenn V. Ohanesian, Fed ID 5317
OHANESIAN LAW FIRM
P.O. Box 2433
Myrtle Beach, SC 29578
Phone: 843-626-7193
Fax: 843-492-5164
Email: OhanesianLawFirm@cs.com

Attorney for Plaintiff Black and McGrier

/s/ Ryan P. Duffy

Ryan P. Duffy, SC Federal ID 13520
THE LAW OFFICE OF RYAN P. DUFFY
1213 W. Morehead St., Suite 500, Unit #450
Charlotte, NC 28208
Phone: (704) 741-9399
Email: rduffy@ryanpduffy.com

*Attorney for Plaintiffs Oscar and Rosemary
Ortiz*

/s/ David A. Maxfield

David A. Maxfield, Fed, ID No. 6293
SOCO80808 Building 808 D Lady Street
Columbia, SC 29201
Tel: (803) 509-6800
Fax: (855) 299-1656
Email: dave@consumerlawsc.com

Attorney for Plaintiff Dunn

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 1, 2025 the foregoing document was filed via the Court's ECF system, which will cause a true and correct copy of the same to be served electronically on all ECF-registered counsel of record.

/s/ Paul J. Doolittle

Paul J. Doolittle

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
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<p>LATAVEIA ALLEN, <i>on behalf of herself and all others similarly situated</i>,</p> <p style="text-align:center">Plaintiff,</p> <p>v.</p> <p>SRP FEDERAL CREDIT UNION,</p> <p style="text-align:center">Defendant.</p>	<p>Case No.: 1:24-cv-07476-CMC</p>
<p>NORMAN BLACK, <i>on behalf of himself and all others similarly situated</i>,</p> <p style="text-align:center">Plaintiff,</p> <p>v.</p> <p>SRP FEDERAL CREDIT UNION,</p> <p style="text-align:center">Defendant.</p>	<p>Case No. 1:24-cv-07519-CMC</p>
<p>GE-QUOIA WHITFIELD, <i>on behalf of herself and all others similarly situated</i>,</p> <p style="text-align:center">Plaintiff,</p> <p>v.</p> <p>SRP FEDERAL CREDIT UNION,</p> <p style="text-align:center">Defendant.</p>	<p>Case No. 1:24-cv-07537-CMC</p>
<p>ROSEMARY ORTIZ, <i>on behalf of herself and all others similarly situated</i>,</p> <p style="text-align:center">Plaintiff,</p> <p>v.</p> <p>SRP FEDERAL CREDIT UNION,</p> <p style="text-align:center">Defendant.</p>	<p>Case No.: 1:24-cv-07671-CMC</p>

City/State/Zip: New York, NY 10151
 Telephone: (212) 532-1091
 Fax: (646) 417-5967
 Email: tbean@sirillp.com

- (4) Jurisdiction of this Court. I, by execution of this Application and Affidavit, consent and agree to comply with the applicable statutes, laws, and rules of the State of South Carolina, with all applicable federal statutes, laws, and rules, including Local Rules of the United States District Court for the District of South Carolina. I consent to the jurisdiction of the United States District Court for the District of South Carolina in all matters of attorney conduct.¹
- (5) Regular Practice of Law. I am a member in good standing of the bar of the highest court in the state of Oklahoma where I regularly practice law. **Attached is my certificate of good standing (Attachment A).**
- (6) Additional Bar Membership. I have been admitted to practice before the following courts: (List all of the courts Applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.) By signing this Affidavit, I certify that I am a member in good standing of each of the listed bars unless otherwise noted.

Court	Date of Admission	Good Standing
State Bar of Oklahoma	09/24/2019	Yes
U.S. District Court for the Northern District of Oklahoma	12/02/2020	Yes
U.S. District Court for the Western District of Oklahoma	11/24/2020	Yes
U.S. District Court for the Eastern District of Michigan	12/07/2022	Yes
U.S. District Court for the Eastern District of Wisconsin	10/25/2022	Yes
U.S. District Court for the District of Colorado	06/20/2023	Yes
U.S. District Court for the District of Nebraska	07/02/2024	Yes
U.S. Court of Appeals for the Tenth Circuit	09/13/2024	Yes

- (7) Pending Disciplinary Matters. Are you presently the subject of any formal suspension or disbarment proceedings, and have you been notified by any disciplinary agency of the initiation of formal procedures?
 Yes No
 (If “yes,” give particulars, such as jurisdiction, court, date, grounds. Information to comply with this paragraph may be provided *in camera* but that fact shall be revealed below.) N/A

¹This District maintains a web site (www.scd.uscourts.gov) from which the federal and local rules of procedure and related materials may be obtained.

- (8) Curtailment of Prior *Pro Hac Vice* Admissions. Have you ever had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked?

Yes No

(If “yes,” give particulars, such as date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation.)

Case Caption/No.:

McCartney v. Ventura County Credit Union, No. 2023CUPP011569

Court: Superior Court of California, County of Ventura Judge: Jeffrey G. Bennett

Date Filed: 10/14/2023; amended on 10/20/2023 Date of Denial: 11/13/2023

Circumstances for Denial: The motion was denied due the nature of the consolidated class action and the Court’s review of the applicant’s recent *pro hac vice* admissions in several California cases, which constituted regular practice within the state rendering him ineligible for *pro hac vice* admission under California Rule of Court 9.40(a)(3). A copy of the Order is attached. (Attachment B)

Case Caption/No.:

Accurso v. Western Electrical Contractors, Inc. et al., No. 24CV017855

Court: Superior Court of California, County of Sacramento Judge: Lauri A. Damrell

Date Filed: 04/01/2025 Date of Denial: 04/18/2025

Circumstances for Denial: The application was denied based on Mr. Bean’s repeated *pro hac vice* appearances in California over the past two years, which the Court found disqualifying under California Rule of Court 9.40(a)(3). A copy of the Order is attached. (Attachment C)

- (9) Sanctions. Have you ever had any certificate or privilege to appear and practice before any judicial or administrative body suspended or revoked, or received a public reprimand or greater sanction?

Yes No

(If “yes,” give particulars, e.g., judicial or administrative body, date of suspension, and reinstatement.) N/A

- (10) Criminal Sanctions. Have you ever been convicted of a felony under the laws of the District of Columbia or of any State or under the laws of the United States?

Yes No

(If “yes,” give particulars, such as date, court, judge, circumstances, and ultimate disposition.)

N/A

- (11) Present and Previous *Pro Hac Vice* in this Court. Have you, within the last ten (10) years, filed an application to appear *pro hac vice* in the United States District Court for the District of South Carolina or another court in the state of South Carolina?

Yes No

(If “yes,” give court, case name, docket number, and status of litigation, year of application, local counsel of record in each case, and state whether application is pending or was granted.) Attach additional pages if necessary.

Case Caption/No.: Cummings v. SRP Federal Credit Union, No. 1:24-cv-07586 (D.S.C.)

Status of Litigation: Closed Year of Application: 2025

Local Counsel of Record: B. Tyler Brooks; Law Office of B. Tyler Brooks PLLC,
PO Box 10767, Greensboro, NC 27404; Tel: (336) 707-8855

Application Status: No decision was issued, as the motion was mooted by the dismissal of Plaintiff Christopher Cummings claims and subsequent closure of the action.

- (12) Designated Local Counsel. Local counsel of record associated with Applicant in this case is:

Attorney Name: Paul J. Doolittle
 Firm Name: Poulin Willey Anastopoulo LLC
 Street Address or P.O. Box: 32 Ann Street
 City, State, and Zip Code: Charleston, South Carolina 29403
 Telephone: (803) 222-2222
 Email: paul.doolittle@poulinwilley.com

I understand that local counsel of record is required to: (1) personally sign each pleading, motion, discovery procedure, or other document served or filed in this Court; (2) accept service of all pleadings and notices as required on behalf of all counsel for the party represented; (3) be present at all pretrial conferences, hearings and trials, unless excused by the Court; (4) be prepared to participate actively as may be necessary; and (5) assure compliance with applicable rules of procedure. Local counsel of record may attend discovery proceedings.

- (13) Associated Counsel. In addition to local counsel designated above, the following counsel are also associated with the undersigned in this case.

Milberg Coleman Bryson Phillips Grossman PLLC, Strauss Borrelli PLLC, Finley Firm, P.C., Stock & DeMarco, LLC, Murphy Law Firm, Hiraldo P.A., Kopelowitz, Ostrow, Tycko & Zavareei LLP, Courtney Maccarone of Levi & Korinsky, Michael Boyle of Bronstein, Gewirtz & Grossman LLC, and Marc Edelson of Edelson Lechtzin LLP

- (14) Application Fee. I affirm that the application fee of three hundred and fifty dollars (\$350) has been paid in accordance with the Local Rules of the United States District Court for the District of South Carolina or paid herewith.
- (15) Electronic Notification. By submitting this application, I consent to electronic notification.
- (16) Represented Party/Parties. I seek to represent the following party/parties:

Plaintiffs Lataveia Allen, Norman Black, Ge-Quoia Whitfield, Rosemary Ortiz, Theresa McGrier, Shannon Dunn, and Ricky Chase

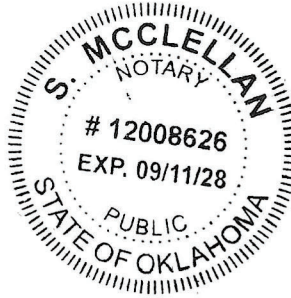
(17) I certify that I have read Local Civil Rule 30.04 regarding the conduct of depositions.

Tyler J. Bean
Tyler J. Bean

Sworn to and subscribed before me
this 29 day of April, 2025.

S. McClellan
A Notary Public
of the State of Oklahoma

My Commission expires: 9/11/28



ATTACHMENT A

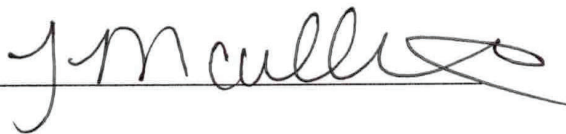
IN THE SUPREME COURT OF THE STATE OF OKLAHOMA**CERTIFICATE**

I, John D. Hadden, Clerk of the Supreme Court of the State of Oklahoma, do hereby certify that Tyler J. Bean, of New York City, New York, was admitted to practice in the Supreme Court of the State of Oklahoma upon exam, on September 24, 2019, and is now an attorney and counselor at law in good standing at the Bar of said State.

WITNESS, my hand and the Seal of the Supreme Court of the State of Oklahoma, this the 8th day of April, 2025.

**JOHN D. HADDEN, CLERK
SUPREME COURT OF OKLAHOMA**

By: _____



S-E-A-L

ATTACHMENT B

SUPERIOR COURT OF CALIFORNIA, COUNTY OF VENTURA

Superior Court of California, County of Ventura, Hall of Justice, Department 21

2023CUPP011569

November 13, 2023

**TREVOR MCCARTNEY vs VENTURA COUNTY CREDIT
UNION**

8:20 AM

Judge: Honorable Jeffrey G. Bennett
Judicial Assistant: Claraliz R. Sotelo-Martinez
CSR: None

APPEARANCES:

NATURE OF PROCEEDINGS: Motion to be Admitted Pro Hac Vice of Tyler Bean

At 8:50 a.m., court convenes in this matter with no appearance by any party.

The Court posted a written tentative ruling.

Plaintiff's counsel submitted on the tentative ruling via email prior to the hearing.

The Court finds/orders:

The Court's tentative is adopted as the Court's ruling as follows:

Plaintiff Trevor McCartney's motion to allow Attorney Tyler Bean to appear *pro hac vice* as Plaintiff McCartney's counsel is DENIED.

First, the motion is procedurally defective, in that it seeks an order granting Attorney Bean leave to act as counsel *pro hac vice* for Plaintiff McCartney only, an order which (a) appears inconsistent with the nature of this action (a consolidated class action with multiple named plaintiffs, where class counsel must protect the rights of the putative class); and (b) the provisions of the [Proposed] Order Consolidating the Related Actions and Appointing Interim Class Counsel lodged on October 13, 2023, regarding the appointment of Interim Class Counsel, including portions of the Proposed Order that the Court approved in its November 6, 2023 Minute Order. (*See Proposed Order*, ¶5.)

Second, Attorney Bean's verified application indicates in ¶7 that he has been granted leave to appear as counsel *pro hac vice* in six federal court cases within California in the last 20 months, with five of these occurring since April 25, 2023 (i.e., the last 6½ months). Acting as an attorney in five cases in California in the last 6½ months presumptively constitutes "[r]egularly engag[ing] in substantial...professional...activities in the State of California," and Attorney Bean's verified application does not demonstrate otherwise. Accordingly, Attorney Bean is disqualified by California Rule of Court 9.40(a)(3) from appearing as counsel *pro hac vice* in this action.

2023CUPP011569

TREVOR MCCARTNEY vs VENTURA COUNTY CREDIT UNION

ATTACHMENT C

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SACRAMENTO

Gordon D. Schaber Superior Court, Department 22

JUDICIAL OFFICER: HONORABLE LAURI A. DAMRELL

Courtroom Clerk: J. Servantez
Court Attendant: C. Levy

CSR: None

24CV017855April 18, 2025
9:00 AM**ACCURSO****vs****WESTERN ELECTRICAL CONTRACTORS
ASSOCIATION, INC., et al.**

MINUTES**APPEARANCES:**

No Appearances

NATURE OF PROCEEDINGS: Hearing on Motion to be Admitted Pro Hac Vice for Tyler J. Bean**COURT RULING:**

There being no request for oral argument the Court affirmed the tentative ruling.

TENTATIVE RULING:

The application of Tyler J. Bean for admission pro hac vice on behalf of Plaintiffs is UNOPPOSED, but DENIED.

A person who is “[r]egularly engaged in substantial business, professional, or other activities in the State of California” is not eligible to appear as counsel pro hac vice under California Rules of Court (“CRC”), Rule 9.40. (CRC, Rule 9.40(a)(3).) Repeated appearances by a person under CRC Rule 9.40 is a cause for denial absent special circumstances. (*Id.*, Rule 9.40(b).) Mr. Bean has previously requested pro hac vice admission in eleven actions in the last two years. (Application, ¶ 9.) In one instance, Mr. Bean’s application was denied because he was “disqualified by California Rule of Court 9.40(a)(3)” as a result of his six prior pro hac vice admissions. (11-13-23 Minute Order in Ventura County Case No. 2023CUPP011569.)^[1] Mr. Bean states no special circumstances excusing such repeated appearances. Accordingly, Mr. Bean’s application for admission pro hac vice is denied.

Having so ruled, Mr. Bean is no longer recognized as “Interim Co-Lead Class Counsel”

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SACRAMENTO

notwithstanding the Court's February 21, 2025 Amended Order Appointing Interim Class Counsel. Plaintiffs' Counsel shall file an Amended Order Appointing Interim Class Counsel for the Court's signature. Any attorney identified as Interim Co-Lead Class Counsel shall be admitted to practice in the State of California or have already been granted admission *pro hac vice* in this matter.

Finally, the Court notes that Counsel's moving papers include "William B. Federman (*pro hac vice*)" in the caption. Pursuant to the Court's February 21, 2025 Minute Order, Mr. Federman's *pro hac vice* application was denied. Going forward, Counsel shall ensure that the caption is accurate.

[¹] The Court, on its own motion, takes judicial notice of the Ventura County Superior Court's order denying Mr. Bean's application.

/s/ J. Servantez

J. Servantez, Deputy Clerk

By:

Minutes of: 04/18/2025

Entered on: 04/18/2025

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**[PROPOSED] ORDER GRANTING MOTION IN SUPPORT
OF PRO HAC VICE APPLICATION**

A Motion and Application/Affidavit for Admission *Pro Hac Vice* has been filed in this case and considered by the undersigned.

IT IS ORDERED THAT:

Applicant Tyler J. Bean who appears on behalf of Plaintiffs, Lataveia Allen, Norman Black, Ge-Quoia Whitfield, Rosemary Ortiz, Theresa McGrier, Shannon Dunn, and Ricky

Chase:

- Be **granted** admission *pro hac vice* in this case.
- Be **denied** admission *pro hac vice* in this case.

Date

UNITED STATES DISTRICT JUDGE