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**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
AIKEN DIVISION**

Mar 25 2026

S.C. SUPREME COURT

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 (lead case)

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

THERESA MCGRIER, *on behalf of herself
and all others similarly situated,*

Plaintiff,

v.

SRP FEDERAL CREDIT UNION,

Defendant.

Case No.: 1:24-cv-07695-CMC

SHANNON DUNN, *on behalf of herself
and all others similarly situated,*

Plaintiff,

v.

SRP FEDERAL CREDIT UNION,

Defendant.

Case No.: 1:25-cv-00210-CMC

RICKY CHASE, *on behalf of himself and all others similarly situated,*

Plaintiff,

v.

SRP FEDERAL CREDIT UNION,

Defendant.

Case No.: 1:25-cv-00312-CMC

MOTION IN SUPPORT OF PRO HAC VICE APPLICATION

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that Raina C. Borrelli 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*.

STRAUSS BORRELLI PLLC

Firm Name

980 N. Michigan Ave., Suite 1610

Street Address or Post Office Box

Chicago, IL 60611

City, State, Zip Code

(872) 263-1100

Telephone Number

raina@straussborrelli.com

E-Mail Address

Paul J. Doolittle

Name of Local Counsel

/s/ Paul J. Doolittle

Signature of Local Counsel

Local Counsel for Plaintiff

Lataveia Allen

District of South Carolina

Federal Bar Number: 6012

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 2, 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

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Case No.: 1:25-cv-00312-CMC

**APPLICATION/AFFIDAVIT FOR
PRO HAC VICE ADMISSION**

- (1) Name. Raina C. Borrelli
First Middle Last
- (2) Residence. I reside in the following state: Minnesota
If a South Carolina resident, indicate months/years of residence: N/A
- (3) Business Address. I am an attorney and practice law under the name of or as a member of the following firm:
- Firm name: STRAUSS BORRELLI PLLC
Mailing address: 980 N. Michigan Ave., Suite 1610 City/State/Zip: Chicago, IL 60611
Telephone number: (872) 263-1100
Facsimile number: (872) 263-1109
E-mail address: raina@straussborrelli.com
(Application will not be considered without an e-mail address to receive electronic notification.)
- (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

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.

- (5) Regular Practice of Law. I am a member in good standing of the bar of the highest court of the District of Columbia or the State of Minnesota where I regularly practice law. **Attached is my certificate of good standing.**
- (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.

STATE COURTS

Court	Bar No.	Admission Date	In Good Standing?
State of Minnesota	392127	10/28/2011	Yes

FEDERAL COURTS

Court	Admission Date	In Good Standing?
U.S.D.C., District of Minnesota	11/8/2011	Yes
U.S.D.C., Eastern District of Wisconsin	5/9/2019	Yes
U.S.D.C., District of Colorado	2/20/2020	Yes
U.S.D.C., Northern District of Illinois	12/21/2021	Yes
U.S.D.C., Eastern District of Michigan	12/21/2021	Yes
U.S. Court of Appeals, 10th Circuit	3/4/2021	Yes
U.S. Court of Appeals, 1st Circuit	11/30/2022	Yes
U.S.D.C., Central District of Illinois	2/14/2023	Yes
U.S. Court of Appeals, 7th Circuit	5/26/2023	Yes
U.S. Court of Appeals, 9th Circuit	9/12/2023	Yes
U.S. Court of Appeals, 2nd Circuit	12/11/2024	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.)

- (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.)

- (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.)

- (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.)

- (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.

- (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 Post Office Box: 32 Ann Street

City, State, and Zip Code: Charleston, South Carolina 29403

Telephone Number: (803) 222-2222

E-Mail Address: 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.
Chestnut Cambronne, PA

(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:
Lataveia Allen

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



Signature of Applicant

Sworn to and subscribed before me
this 31st day of May, 2025.

3070

A Notary Public
of the State of Minnesota

My Commission expires: 01/31/25

**STATE OF MINNESOTA
IN SUPREME COURT**

Certificate of Good Standing

This is to certify that the following lawyer is in good standing

RAINA CHALLEEN BORRELLI

was duly admitted to practice as a lawyer and counselor at law in all the courts of this state on

October 28, 2011

Given under my hand and seal of this court on

May 07, 2025

Emily J. Eschweiler

Emily J. Eschweiler, Director
Office of Lawyer Registration



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ORDER

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: Raina C. Borrelli who represents Plaintiff Lataveia Allen

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

Date

United States District/Magistrate Judge