

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA

RECEIVED

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

MOTION IN SUPPORT OF PRO HAC VICE APPLICATION

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that Gary M. Klinger 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): **Defense Counsel has not yet appeared. Plaintiff's counsel will serve a copy of the Pro Hac Vice Motion and application to Defendant with the Complaint.**

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 Plaintiff

Lataveia Allen

District of South Carolina

Federal Bar Number: 6012

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 3, 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

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
(AIKEN DIVISION)

Lataveia Allen, on behalf of herself and all
others similarly situated,
Plaintiff/Petitioner/USA,
v.
SRP Federal Credit Union,
Defendant/Respondent.

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

Application/Affidavit for
Pro Hac Vice Admission

(1) Name. Gary M. Klinger
First Middle Last

(2) Residence. I reside in the following state: Illinois
If a South Carolina resident, indicate months/years of residence:

(3) Business Address. I am an attorney and practice law under the name of or as a member of the
following firm:

Firm name: Milberg Coleman Bryson Phillips Grossman PLLC
Mailing address: 227 W. Monroe Street, Suite 2100 City/State/Zip: Chicago, IL 60606
Telephone number: (866) 252-0878
Facsimile number:
E-mail address: gklinger@milberg.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

(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 Illinois 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

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.

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:	Bar No.
State Bar of Illinois	11/4/2010	6303726
U.S. District Court for the District of Colorado	9/23/2019	
U.S. District Court for the Central District of Illinois	7/2015	
U.S. District Court for the Northern District of Illinois	5/25/2012	6303726
U.S. District Court for the Southern District of Illinois	12/30/2020	
U.S. District Court for the Northern District of Indiana	1/30/2020	
U.S. District Court for the Southern District of Indiana	3/21/2019	6303726
U.S. District Court for the Eastern District of Michigan	3/24/2020	
U.S. District Court for the Western District of Michigan	1/17/2023	
U.S. District Court for the District of Nebraska	8/20/2019	
U.S. District Court for the Northern District of Ohio	5/23/2023	
U.S. District Court for the Eastern District of Texas	10/11/2019	
U.S. District Court for the Western District of Texas	2/13/2024	
U.S. District Court for the Eastern District of Wisconsin	8/12/2021	
U.S. Court of Appeals for the 2nd Circuit	4/18/2022	

(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.)

[Type text]

- (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.

PLEASE SEE ATTACHED

- (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.

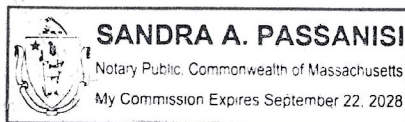
- (17) I certify that I have read Local Civil Rule 30.04 regarding the conduct of depositions.

Gary M. Klinger
Signature of Applicant

Sworn to and subscribed before me
this 3rd day of February, 2025.

Sandra A. Passanisi
A Notary Public
of the Commonwealth of Massachusetts

My Commission expires: 9/22/2028



[Type text]

Court	Case Name	Docket No.	Status	Year of Application	Local Counsel	Pending or Granted
District Court of South Carolina	Kersey, et al v. Georgetown Hosp. System dba Tidelands Health	2:20-cv-00208	Closed	2020	Harper Todd Segui	Granted
South Carolina (Charleston Cnty. 9th Judicial Circ.)	Frederick, et al v. Roper St. Francis Healthcare	2021-CP-10-00756	Closed	2021	W. Christopher Swett	Granted
District Court of South Carolina	Andrews v. Prisma Health	6:23-cv-03153	Closed	2023	Harper Todd Segui	Granted
District Court of South Carolina	Burns v. Advance America Cash Advance Centers, Inc. d/b/a Advance America	7:23-cv-04286-DCC	Closed	2023	Harper Todd Segui	Granted
District Court of South Carolina	Dollar et al v. Kyocera AVX Components Corporation	6:23-cv-06087-BHH	Open	2024	Harper Todd Segui	Granted
District Court of South Carolina	Sosebee v. Evening Post Publishing, Inc.	2:24-cv-04578-BHH	Open	2024	Paul J. Doolittle	Granted

Certificate of Admission To the Bar of Illinois

I, Cynthia A. Grant, Clerk of the Supreme Court of Illinois, do hereby certify that

Gary Michael Klinger

has been duly licensed and admitted to practice as an Attorney and Counselor at Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on 11/04/2010 and is in good standing, so far as the records of this office disclose.

IN WITNESS WHEREOF, I have hereunto
subscribed my name and affixed the
seal of said Court, this 27th day of
January, 2025.

Cynthia A. Grant

Clerk,
Supreme Court of the State of Illinois

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

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

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: Gary M. Klinger 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