

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that John Charles Cleary 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*.

Robinson Gray Stepp & Laffitte, LLC

Firm Name

PO Box 11449

Street Address or Post Office Box

Columbia, SC 29211

City, State, Zip Code

803-929-1400

Telephone Number

brichardson@robinsongray.com

E-Mail Address

Beth Burke Richardson

Name of Local Counsel

s/ Beth Burke Richardson

Signature of Local Counsel

Local Counsel for the Defendant

District of South Carolina

Federal Bar Number 9335

ROSEMARY ORTIZ, on behalf of herself and all)
 Others similarly situated,)
)
 Plaintiff,)
)
 v.)
)
 SRP FEDERAL CREDIT UNION,)
)
 Defendant.)

Case Number 1:24-cv-07671-CMC

THERESA MCGRIER individually and on)
 behalf of all others similarly situated)
 Plaintiff,)
)
 v.)
)
 SRP FEDERAL CREDIT UNION,)
)
 Defendant.)

Case Number 1:24-cv-07695-CMC

SHANNON DUNN, individually and on behalf)
 of all others similarly situated,)
)
 Plaintiff,)
)
 v.)
)
 SRP FEDERAL CREDIT UNION,)
)
 Defendant.)

Case Number 1:25-cv-00210-CMC

RICKY CHASE, on behalf of herself and all)
 others similarly situated,)
)
 Plaintiff,)
)
 v.)
)
 SRP FEDERAL CREDIT UNION,)
)
 Defendant.)

Case Number 1:25-cv-00312-CMC

(1) Name. John Charles Cleary
First Middle Last

(2) Residence. I reside in the following state: New Jersey
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: Polsinelli PC
Mailing address: 600 Third Avenue, 42nd Floor City/State/Zip New York, NY 10016
Telephone number: 212-413-2837
Facsimile number: 212-684-0197
E-mail address: john.cleary@polsinelli.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 States of New York and New Jersey where I regularly practice law. **Attached are my certificates 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.

Court	Date Admitted	Good Standing
<u>See attached list</u>		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

(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

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.

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

Attorney Name: Beth Burke Richardson
Firm Name: Robinson Gray Stepp & Laffitte, LLC
Street Address or Post Office Box: PO Box 11449
City, State, and Zip Code: Columbia, SC 29211
Telephone Number: 803-929-1400
E-Mail Address: brichardson@robinsongray.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.

(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:
SRP Federal Credit Union

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

John C Cleary
Signature of Applicant

Sworn to and subscribed before me
this 5th day of May, 2025.

M. Negron
A Notary Public
of the State of New York

My Commission expires: 10/30/27

MADELINE NEGRON
NOTARY PUBLIC, STATE OF NEW YORK
Registration No. 01NE0015288
Qualified in West County
Commission Expires October 30, 2027

John C. Cleary
Bar Memberships

Court / State Bar	Date Admitted	Good Standing (Active or Inactive)
United States Supreme Court	02/22/1993	Yes (Active)
United States Court of Appeals for the District of Columbia Circuit	05/13/1988	Yes (Active)
United States Court of Appeals for the Third Circuit	04/07/1995	Yes (Active)
United States Court of Appeals for the Second Circuit	06/23/2022	Yes (Active)
United States Court of Appeals for the Federal Circuit	08/29/1996	Yes (Active)
United States District Court for the Southern District of New York	04/02/1985	Yes (Active)
United States District Court for the Eastern District of New York	05/01/1985	Yes (Active)
United States District Court for the Eastern District of Michigan	06/08/1993	Yes (Active)
United States District Court for the Western District of Pennsylvania	02/24/1994	Yes (Active)
United States District Court for the Southern District of Indiana	03/28/1995	Yes (Active)
United States District Court for the Northern District of Illinois	09/07/1999	Yes (Active)
United States District Court for the Northern District of New York	10/20/2003	Yes (Active)
United States District Court for the District of New Jersey	01/08/2015	Yes (Active)
United States District Court for the District of Columbia	08/07/2017	Yes (Active)
United States Court of International Trade	07/16/1993	Yes (Active)
New York	03/04/1985	Yes (Active)

New Jersey	11/16/2009	Yes (Active)
District of Columbia	01/02/1987	Yes (Inactive)
Pennsylvania	02/28/1994	Yes (Inactive)
Texas	09/12/1996	Yes (Inactive)



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

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

John Charles Cleary

*was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on **March 4, 1985**, 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 February 6, 2025.



Susanna M. Rojas

Clerk of the Court

Supreme Court of New Jersey



Certificate of Good Standing

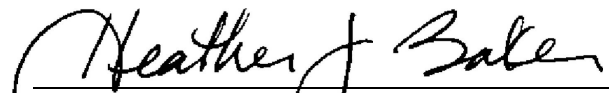
This is to certify that **JOHN C CLEARY**
(No. **028482009**) *was constituted and appointed an Attorney at Law of New Jersey on* **November 16, 2009** *and, as such, has been admitted to practice before the Supreme Court and all other courts of this State as an Attorney at Law, according to its laws, rules, and customs.*

I further certify that as of this date, the above-named is an Attorney at Law in Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing" if the Court's records reflect that the attorney: 1) is current with all assessments imposed as a part of the filing of the annual Attorney Registration Statement, including, but not limited to, all obligations to the New Jersey Lawyers' Fund for Client Protection; 2) is not suspended or disbarred from the practice of law; 3) has not resigned from the Bar of this State; and 4) has not been transferred to Disability Inactive status pursuant to Rule 1:20-12.

Please note that this Certificate does not constitute confirmation of an attorney's satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to practice law in this State.



In testimony whereof, I have hereunto set my hand and affixed the Seal of the Supreme Court, at Trenton, this 5th day of February, 2025.


Clerk of the Supreme Court