

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that Starr Turner Drum 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
P.O. 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

Columbia, South Carolina
July 22, 2025

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: Starr Turner Drum
First Middle Last

(2) Residence. I reside in the following state: Alabama
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 Law Firm
Mailing address: 2100 Southbridge Pkwy, Suite 650 City/State/Zip Birmingham, AL 35209
Telephone number: 205-963-7136
Facsimile number: 205-963-7156
E-mail address: sdrum@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 District of Columbia or the State of Alabama 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.

Court	Date Admitted	Good Standing	
<u>Missouri Eastern District Court</u>	<u>July 8, 2025</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<u>Colorado District Court</u>	<u>February 13, 2025</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<u>Illinois Northern District Court</u>	<u>October 23, 2024</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
(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.)

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.)

- (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:

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.

[Type text]

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

Shundra Crumpton Manning and John Cleary

(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.



Signature of Applicant

Sworn to and subscribed before me
this 17th day of July, 2025.



A Notary Public
of the State of Alabama

My Commission expires: September 30, 2025



Alabama State Bar



415 DEXTER AVENUE
POST OFFICE BOX 671
MONTGOMERY, AL 36101

CERTIFICATE OF GOOD STANDING

Occupational License

STATE OF ALABAMA COUNTY OF MONTGOMERY

*I, Terri B. Lovell, Secretary of the Alabama State Bar and custodian of its records, hereby certify **Starr Turner Drum** has been duly admitted to the Bar of this State and is entitled to practice in all of the courts of this State including the Supreme Court of Alabama, which is the highest court of said state.*

*I further certify that **Starr Turner Drum** was admitted to the Alabama State Bar on September 25, 2009.*

*I further certify that said **Starr Turner Drum** is presently a member in good standing of the Alabama State Bar, having met all licensing requirements for the year ending September 30, 2025.*

IN WITNESS WHEREOF, I have hereunto set my hand and the seal of the State of Alabama on July 16, 2025.

A handwritten signature in cursive script that reads "Terri B. Lovell".

Terri B. Lovell, Secretary

