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Jul 01 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Thomas W. McGee III, Circuit Court Judge

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Trial Court Case No. 2023-CP-40-01850  
Appellate Case No. 2025-002437

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SOUTH CAROLINA PUBLIC INTEREST FOUNDATION and JOHN SLOAN,  
individually and on behalf of all others similarly situated..... Appellants,

v.

SOUTH CAROLINA STATE LAW ENFORCEMENT DIVISION and Mark Keel, in his  
official capacity as Chief of the South Carolina State Law Enforcement Division..... Respondents.

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**MOTION FOR ADMISSION *PRO HAC VICE* OF JAMES AARON ODELL**

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Under Rule 404 of the South Carolina Appellate Court Rules, E. Brandon Gaskins, a regular member of the South Carolina Bar in good standing, who serves as counsel of record for *amicus curiae* the Institute for Justice in the above captioned matter, hereby moves for the admission of James A. Odell to practice *pro hac vice* before this Court.

James A. Odell is a member in good standing of the bar of the highest court of the State of Florida. Mr. Odell is an attorney with the non-profit public interest law firm Institute for Justice.

Attached to this motion are Mr. Odell's verified application to be admitted *pro hac vice* (Exhibit "A"), Mr. Odell's Certificate of Good Standing in the state of Florida (Exhibit "B"), and a certification from the South Carolina Supreme Court Office of Bar Admissions acknowledging receipt of that application and the related fee (Exhibit "C").

THEREFORE, the movant prays for an Order of this Court permitting the appearance of James A. Odell, *pro hac vice* in this action as counsel for *amicus curiae* the Institute for Justice.

Respectfully submitted,

s/ E. Brandon Gaskins

E. Brandon Gaskins (SC Bar No. 73274)

Moore & Van Allen PLLC

78 Wentworth Street

P.O. Box 22828

Charleston, SC 29413-2828

Telephone: (843) 579-7000

Facsimile: (843) 579-7099

Email: [brandongaskins@mvalaw.com](mailto:brandongaskins@mvalaw.com)

Attorney for *Amicus Curiae*

July 1, 2026

Charleston, South Carolina

# **EXHIBIT A**

# Pro Hac Vice Application

Amendment Submitted on 06.25.2026

## General Information

### Personal Information

|                                |                            |
|--------------------------------|----------------------------|
| Applicant First Name           | James                      |
| Applicant Middle Name          | Aaron                      |
| Applicant Last Name            | Odell                      |
| Applicant Suffix               |                            |
| Applicant Business Address 1   | 2 South Biscayne Boulevard |
| Applicant Business Address 2   | Suite 3180                 |
| Applicant City                 | Miami                      |
| Applicant State                | Florida                    |
| Applicant Zip Code             | 33131                      |
| Applicant County               | Miami-Dade                 |
| Applicant Primary Phone Number | (703) 682-9320             |
| Applicant Cell Phone Number    | null                       |
| Applicant Primary Email        | jodell@ij.org              |

### Applicant Firm Information

|                                 |                            |
|---------------------------------|----------------------------|
| Applicant Law Firm Name         | Institute for Justice      |
| Applicant Law Firm Address 1    | 2 South Biscayne Boulevard |
| Address 2                       | Suite 3180                 |
| City                            | Miami                      |
| State                           | FL                         |
| Zip Code                        | 33131                      |
| Applicant Law Firm County       | Miami-Dade                 |
| Applicant Law Firm Phone Number | 7036829320                 |
| Applicant Law Firm Email        | jodell@ij.org              |

### Case Information

|                |                                                          |
|----------------|----------------------------------------------------------|
| Plaintiff Name | South Carolina Public Interest Foundation and John Sloan |
|----------------|----------------------------------------------------------|

Defendant Name South Carolina State Law Enforcement Division and Mark Keel

Case Name South Carolina Public Interest Foundation and John Sloan, individually and on behalf of all others similarly situated v. South Carolina State Law Enforcement Division and Mark Keel, in his official capacity as Chief of the South Carolina Law Enforcement Division

Case Number (Please include all zeros in case number) 2025-002437

Applicant Retained By N/A (participating as amicus curiae)

Tribunal South Carolina Court of Appeals

Tribunal Address 1 1220 Senate St

Address 2

City Columbia

State  
South Carolina

Zip Code 29201

#### Local Counsel Information

Are you filing a pro hac vice application to appear in an arbitration, mediation, or alternative dispute resolution? No

**Please be aware that local counsel must be Rule 403 certified.**

Local Counsel First Name Brandon

Local Counsel Last Name Gaskins

Local Counsel Bar Number SC Bar No. 73274

Local Counsel Law Firm Name Moore & Van Allen PLLC

Local Counsel Law Firm Address 1 78 Wentworth Street

Address 2 P.O. Box 22828

City Charleston

State SC

Zip Code 29413

Local Counsel Law Firm County Charleston

Local Counsel Primary Phone Number 8435797000

Local Counsel Cell Phone Number 8435797000

Local Counsel Email brandongaskins@mvalaw.com

#### Jurisdictions/Courts

#### Jurisdictions/Courts

**List all courts before which you have been admitted to practice law, including United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and state courts or the District of Columbia.**

**NOTE:** You will be required to upload **one** certificate of good standing dated within the last 90 days from the highest court of the District of Columbia or the State where the applicant regularly practices law.

**NOTE:** If you are filing a pro hac vice application to appear in an arbitration, mediation, or other alternative dispute resolution proceeding in South Carolina, the certificate of good standing you are required to upload must be from the jurisdiction where your pre-existing representation of a client is located.

|                                                                       |                                                   |
|-----------------------------------------------------------------------|---------------------------------------------------|
| Court Name                                                            | U.S. District Court, Southern District of Florida |
| Jurisdiction                                                          | Southern District of Florida                      |
| Date Admitted                                                         | 3-2022                                            |
| Are you presently a member in good standing of the bar of this court? | Yes                                               |

|                                                                       |                                                 |
|-----------------------------------------------------------------------|-------------------------------------------------|
| Court Name                                                            | U.S. District Court, Middle District of Florida |
| Jurisdiction                                                          | Middle District of Florida                      |
| Date Admitted                                                         | 7-2025                                          |
| Are you presently a member in good standing of the bar of this court? | Yes                                             |

|                                                                       |                                                    |
|-----------------------------------------------------------------------|----------------------------------------------------|
| Court Name                                                            | U.S. District Court, Eastern District of Wisconsin |
| Jurisdiction                                                          | Eastern District of Wisconsin                      |
| Date Admitted                                                         | 10-2022                                            |
| Are you presently a member in good standing of the bar of this court? | Yes                                                |

|                                                                       |                                                    |
|-----------------------------------------------------------------------|----------------------------------------------------|
| Court Name                                                            | U.S. District Court, Western District of Wisconsin |
| Jurisdiction                                                          | Western District of Wisconsin                      |
| Date Admitted                                                         | 9-2022                                             |
| Are you presently a member in good standing of the bar of this court? | Yes                                                |

|                                                                       |                                       |
|-----------------------------------------------------------------------|---------------------------------------|
| Court Name                                                            | U.S. Court of Appeals, Fourth Circuit |
| Jurisdiction                                                          | Fourth Circuit                        |
| Date Admitted                                                         | 6-2026                                |
| Are you presently a member in good standing of the bar of this court? | Yes                                   |

|                                                                       |                          |
|-----------------------------------------------------------------------|--------------------------|
| Court Name                                                            | Supreme Court of Florida |
| Jurisdiction                                                          | Florida                  |
| Date Admitted                                                         | 11-2012                  |
| Are you presently a member in good standing of the bar of this court? | Yes                      |

|                                                                       |                                         |
|-----------------------------------------------------------------------|-----------------------------------------|
| Court Name                                                            | Supreme Court of the State of Wisconsin |
| Jurisdiction                                                          | Wisconsin                               |
| Date Admitted                                                         | 9-2022                                  |
| Are you presently a member in good standing of the bar of this court? | Yes                                     |

Are you presently subject to any suspension or disbarment proceedings, or been formally notified of any complaints pending before a disciplinary agency? No

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**Prior Pro Hac Vice Applications**

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**Prior Pro Hac Vice Applications**

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Have you previously filed an application to appear Pro Hac Vice in any South Carolina cases? No

Have you ever had any application for admission Pro Hac Vice denied or any Pro Hac Vice admission revoked in this or any other jurisdiction? No

**NOTE:** You must upload a copy of any order of denial or revocation.

Have you ever had any certificate or privilege to appear and practice before any court or administrative body suspended or revoked? No

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**Attestations**

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**Attestations**

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Applicant agrees to comply with the applicable statutes, law and rules of the State of South Carolina; be familiar with and comply with the South Carolina Rules of Professional Conduct. I Agree

Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct. I Consent

Type name in the box to sign electronically James Aaron Odell

**Signed on this date: 06/23/2026 15:28:49**

Type in Date 6-23-2026

## LOCAL COUNSEL CONSENT

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 22<sup>nd</sup> day of June, 20 26

E. B. M.

LOCAL COUNSEL OF RECORD

VERIFICATION

STATE OF Florida )

COUNTY OF Miami-Dade )

I, James Odell, do hereby swear or affirm under penalty of perjury that I am the applicant in the above-styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true. I understand that I am under a continuing duty to promptly update the information provided in the application until the tribunal has ruled on the motion for admission *pro hac vice*. Further, if the motion is granted, I understand that I am under a continuing duty to promptly update the information provided in the application as long as I continue to appear *pro hac vice* in the action or proceeding. Any updated information shall be provided to both the tribunal that granted the motion and to the tribunal in which the action or proceeding may then be pending.



APPLICANT/AFFIANT

Subscribed and sworn to before me this 23<sup>RD</sup> day of JUNE, 2020

  
(Notary Signature)

Notary Public for the State of FLORIDA

My Commission Expires: JANUARY 24, 2028



REBEKAH S.H. RAMIREZ  
Commission # HH 476541  
Expires January 24, 2028

## **EXHIBIT B**

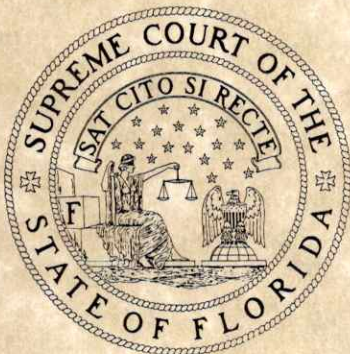
# Supreme Court of Florida

## Certificate of Good Standing

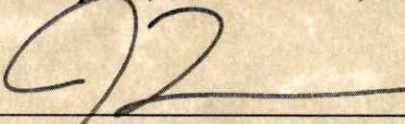
*I, JOHN A. TOMASINO, Clerk of the Supreme Court of the State of Florida, do hereby certify that*

**JAMES AARON ODELL**

*was admitted as an attorney and counselor entitled to practice law in all the Courts of the State of Florida on NOVEMBER 28, 2012, is presently in good standing, and that the private and professional character of the attorney appear to be good.*



*WITNESS my hand and the Seal of the  
Supreme Court of Florida at Tallahassee,  
the Capital, this JUNE 9, 2026.*

  
\_\_\_\_\_  
*Clerk of the Supreme Court of Florida*

## **EXHIBIT C**

PHV Certification

Jun 26 2026

**South Carolina Supreme Court  
Office of Bar Admissions  
1231 Gervais Street  
Columbia, SC 29201  
<https://sctbaradmissions.sccourts.org>**



**The Supreme Court of South Carolina  
Office of Bar Admissions**

PATRICIA A. HOWARD  
CLERK OF COURT

T. KYLE TENNIS  
DEPUTY CLERK

KATHLEEN "TINA" BRYANT  
MANAGER, OFFICE OF BAR  
ADMISSIONS

POST OFFICE BOX 11330  
COLUMBIA, SOUTH CAROLINA  
29211  
TELEPHONE: (803) 734-1317  
FAX: (803) 734-0394

June 26, 2026

James Aaron Odell  
2 South Biscayne Boulevard  
Suite 3180  
Miami, FL 33131

RE: South Carolina Public Interest Foundation, et al. v. South Carolina State Law Enforcement Division, et al.

Appellate Case No. 2025-002437

Dear Applicant:

I certify that the Office of Bar Admissions has received your application for admission pro hac vice in the above action. The \$250 admission fee has been paid.

Sincerely,

T. Kyle Tennis

Deputy Clerk

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SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
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SOUTH CAROLINA PUBLIC INTEREST FOUNDATION and JOHN SLOAN,  
individually and on behalf of all others similarly situated..... Appellants,

v.

SOUTH CAROLINA STATE LAW ENFORCEMENT DIVISION and Mark Keel, in his  
official capacity as Chief of the South Carolina State Law Enforcement Division..... Respondents.

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#### PROOF OF SERVICE

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This is to certify that I have this day served counsel in the above-captioned matter with a copy of the **Motion for Admission Pro Hac Vice of Michael Benjamin Soyfer, Motion for Admission Pro Hac Vice of James Aaron Odell, and the Motion for Admission Pro Hac Vice of Robert Frommer** via electronic mail only, addressed as follows:

fred.hanna@smithrobinsonlaw.com  
austin.reed@smithrobinsonlaw.com  
murrell@smithrobinsonlaw.com  
awhitsett@sled.sc.gov  
pahearn@sled.sc.gov  
daniel.plyler@smithrobinsonlaw.com  
barry.friedman@law.nyu.edu  
nancy.glass@nyu.edu  
james.carpenter@carpenterlawfirm.net  
attorneyalesia@gmail.com  
jpeterman@orrick.com  
allie@clekis.com  
mcavedon@cato.org

Respectfully submitted,

*s/E. Brandon Gaskins*

E. Brandon Gaskins (SC Bar No. 73274)

Moore & Van Allen PLLC

78 Wentworth Street

P.O. Box 22828

Charleston, SC 29413-2828

Telephone: (843) 579-7000

Facsimile: (843) 579-7099

brandongaskins@mvalaw.com

*Attorney for Amicus Curiae*

July 1, 2026

Charleston, South Carolina

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Jul 01 2026

Moore & Van Allen

July 1, 2026

SC Court of Appeals

**VIA E-FILING**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211  
[ctappfilings@mvalaw.com](mailto:ctappfilings@mvalaw.com)

**E. Brandon Gaskins**  
Attorney at Law

T 843 579 7038  
F 843 579 8738  
[brandongaskins@mvalaw.com](mailto:brandongaskins@mvalaw.com)

Moore & Van Allen PLLC

78 Wentworth Street  
Charleston, SC 29401-1428

Mailing Address:  
Post Office Box 22828  
Charleston, SC 29413-2828

**Re: South Carolina Public Interest Foundation and John Sloan, individually and on behalf of all others similarly situated vs. South Carolina State Law Enforcement Division and Mark Keel, in his official capacity as Chief of the South Carolina State Law Enforcement Division  
Civil Action No.: 2023-CP-40-01850  
Appellate Case No.: 2025-002437**

Dear Ms. Kitchings,

With regard to the above-referenced matter, please accept the following for filing:

- Motion for Admission Pro Hac Vice of Michael Benjamin Soyfer;
- Motion for Admission Pro Hac Vice of James Aaron Odell;
- Motion for Admission Pro Hac Vice of Robert Peller Frommer; and
- Proof of Service.

The required respective filing fees in the amount of \$50.00 for each motion are being mailed to the Court under separate cover.

By copy of this letter, I am serving all counsel in the above matter with a copy of the Motions for Admission *Pro Hac Vice*. Thank you for your assistance in this matter. If you should have any questions or concerns, please feel free to contact me.

Sincerely,



E. Brandon Gaskins

EBG/llp

Enclosures: As Stated.

cc:

**VIA EMAIL ONLY**

James G. Carpenter, Esq.

Jeremy Peterman, Esq.

Alexandra Elysse Menegakis, Esq.

Phyllis Alesia Rico Flores, Esq.

Barry Friedman, Esq.

Nancy Glass, Esq.

Frederick Newman Hanna, Jr., Esq.

Daniel Clifton Plyler, Esq.

Austin Tyler Reed, Esq.

George Murrell Smith, Jr., Esq.

Adam L. Whitsett, Esq.

Paul Thomas Ahearn, III, Esq.

Matthew P. Cavedon, Esq.