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Oct 06 2026

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
COUNTY OF RICHLAND	)	FIFTH JUDICIAL CIRCUIT
	)	Case No.: 2025-CP-40-07466
Elizabeth Souder,	)	
Appellant/Petitioner,	)	**MOTION FOR ADMISSION PRO HAC VICE OF RENÉE FLAHERTY**
v.	)	
City of Columbia and the City of Columbia Board of Zoning Appeals,	)	
Defendants/Respondents.	)	

Appellant/Petitioner Elizabeth Souder moves for the admission, pro hac vice, of Renée Flaherty of the Institute for Justice, for the purposes of her representation of Elizabeth Souder in this matter. This motion is supported by the Application for Admission Pro Hac Vice (Exhibit "A"), the Certificate of Good Standing (Exhibit "B"), and the letter from the South Carolina Supreme Court Office of Bar Admissions verifying the application has been received and the filing fee was paid (Exhibit "C").

Pursuant to Rule 11(a) of the South Carolina Rules of Civil Procedure, the undersigned counsel for Elizabeth Souder verifies that he has communicated via electronic mail with Pete Balthazor, counsel for the City of Columbia Board of Zoning Appeals, and Mike Hemlepp Jr., counsel for the City of Columbia. Both have consented to the filing of this motion.

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WHEREFORE, Elizabeth Souder requests Renée Flaherty of the Institute for Justice be admitted for the purposes of representing Elizabeth Souder in this action on her behalf.

Respectfully submitted,

s/Geoffrey K. Chambers, Esq.
Geoffrey Chambers
Attorney for Appellant/Petitioner
Chambers Business Law
411 Walnut Street
Number 10646
864-508-0899
Geoffrey@CPERLgroup.com

November 21, 2025

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CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of November, 2025, a true and correct copy of the foregoing **MOTION FOR ADMISSION PRO HAC VICE OF RENÉE FLAHERTY** was sent via first class mail and electronic mail, upon the following Defendants/Respondents:

City of Columbia
Erika D. Moore Hammond, MMC, CPM
City Clerk
Office of the City Clerk
1737 Main Street,
Columbia, SC 29201
Erika.Hammond@columbiasc.gov

W. Mike Hemlepp, Jr., Esq.
Senior Asst. City Attorney – Litigation
City of Columbia
PO Box 667
Columbia, SC 29202
William.Hemlepp@columbiasc.gov

City of Columbia Board of Zoning Appeals
Mr. Peter Balthazor, Esq.
Riley, Pope and Laney
PO Box 11412
Columbia, SC 29211
peteb@rplfirm.Esquire

s/Geoffrey K. Chambers, Esq.
Geoffrey Chambers
Attorney for Appellant/Petitioner

EXHIBIT A

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Pro Hac Vice Application

Application Submitted on 11.13.2025

General Information	
Personal Information	
Applicant First Name	Renee
Applicant Middle Name	
Applicant Last Name	Flaherty
Applicant Suffix	
Applicant Business Address 1	901 N. Glebe Road
Applicant Business Address 2	Suite 900
Applicant City	Arlington
Applicant State	Virginia
Applicant Zip Code	22203
Applicant County	Arlington
Applicant Primary Phone Number	7036829320
Applicant Cell Phone Number	nill
Applicant Primary Email	rflaherty@ij.org
Applicant Firm Information	
Applicant Law Firm Name	Institute for Justice
Applicant Law Firm Address 1	901 North Glebe Road
Address 2	Suite 900
City	Arlington
State	VA
Zip Code	22203
Applicant Law Firm County	Arlington
Applicant Law Firm Phone Number	7036829320
Applicant Law Firm Email	rflaherty@ij.org
Case Information	
Plaintiff Name	Elizabeth Souder

Defendant Name	City of Columbia and the City of Columbia Board of Zoning Appeals
Case Name	Souder v. City of Columbia, et al.
Case Number (Please include all zeros in case number)	2025CP4007466
Applicant Retained By	Elizabeth Souder
Tribunal	Richland County
Tribunal Address 1	1701 Main Street
Address 2	#265
City	Richland
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	Geoffrey
Local Counsel Last Name	Chambers
Local Counsel Bar Number	078475
Local Counsel Law Firm Name	Chambers Business Law
Local Counsel Law Firm Address 1	411 Walnut Street
Address 2	Number 10646
City	Green Cove Springs
State	FL
Zip Code	32043
Local Counsel Law Firm County	Clay County
Local Counsel Primary Phone Number	8645080899
Local Counsel Cell Phone Number	8285565893
Local Counsel Email	Geoffrey@CPERLgroup.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.

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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	District of Columbia Court of Appeals (DC Bar)
Jurisdiction	District of Columbia
Date Admitted	12-2012
Are you presently a member in good standing of the bar of this court?	Yes

Court Name	United States Tax Court
Jurisdiction	Federal
Date Admitted	11-2012
Are you presently a member in good standing of the bar of this court?	Yes

Court Name	United States Supreme Court
Jurisdiction	Federal
Date Admitted	2-2015
Are you presently a member in good standing of the bar of this court?	Yes

Court Name	United States Court of Appeals for the First Circuit
Jurisdiction	Federal
Date Admitted	4-2025
Are you presently a member in good standing of the bar of this court?	Yes

Court Name	United States Court of Appeals for the Fifth Circuit
Jurisdiction	Federal
Date Admitted	1-2023
Are you presently a member in good standing of the bar of this court?	Yes

Court Name	United States Court of Appeals for the Seventh Circuit
Jurisdiction	Federal
Date Admitted	5-2016
Are you presently a member in good standing of the bar of this court?	Yes

Court Name	The Supreme Court of Maryland (Maryland Bar)
Jurisdiction	Maryland
Date Admitted	1-2012
Are you presently a member in good standing of the bar of this court?	Yes

Court Name	U.S. District Court for the Northern District of Illinois, Eastern Division

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Jurisdiction	Federal
Date Admitted	3-2014
Are you presently a member in good standing of the bar of this court?	Yes
Court Name	U.S. Court of Appeals for the District of Columbia Circuit
Jurisdiction	Federal
Date Admitted	7-2018
Are you presently a member in good standing of the bar of this court?	Yes
Court Name	U.S. District Court for the District of Columbia
Jurisdiction	Federal
Date Admitted	1-2017
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

Prior Pro Hac Vice Applications

Prior Pro Hac Vice Applications

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

Attestations

Attestations

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	Renee Flaherty
Signed on this date: 11/13/2025 15:59:41	
Type in Date	11-13-2025

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EXHIBIT B

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On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, the District of Columbia Bar does hereby certify that

Renee Denise Flaherty

was duly qualified and admitted on December 10, 2012 as an attorney and counselor entitled to practice before this Court; and is, on the date indicated below, an Active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on November 06, 2025.

JULIO A. CASTILLO
Clerk of the Court

Issued By:

David Chu - Director, Membership
District of Columbia Bar Membership

For questions or concerns, please contact the D.C. Bar Membership Office at 202-626-3475 or email memberservices@dcbar.org.

EXHIBIT C

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South Carolina Supreme Court
Office of Bar Admissions
1231 Gervais Street
Columbia, SC 29201
https://scbaradmissions.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

November 14, 2025

Renee Flaherty
901 N. Glebe Road
Suite 900
Arlington, VA 22203

RE: Elizabeth Souder v. City of Columbia and the City of Columbia Board of Zoning Appeals

Case No. 2025-CP-40-07466

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

T. Kyle Tennis

Deputy Clerk

ELECTRONICALLY FILED - 2026 Jan 23 11:29 AM - RICHLAND - COMMON PLEAS - CASE#2025CP4007466

STATE OF SOUTH CAROLINA COUNTY OF RICHLAND	IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT
Elizabeth Souder, Appellant/Petitioner, v. THE CITY OF COLUMBIA and THE CITY OF COLUMBIA BOARD OF ZONING APPEALS, Defendants/Respondents.	Case No.: 2025-CP-40-07466 **PROPOSED ORDER GRANTING MOTION FOR ADMISSION PRO HAC VICE OF RENÉE FLAHERTY**

The Motion for Admission Pro Hac Vice of Renée Flaherty was filed on November 21, 2025, in the above entitled matter. That Motion is supported by the appropriate Verified Application, has merit, and should be granted.

IT IS SO ORDERED.

The Honorable Thomas W. McGee, III

Electronic signature page to follow.

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Richland Common Pleas

Case Caption: Elizabeth Souder VS City Of Columbia , defendant, et al

Case Number: 2025CP4007466

Type: Order/Pro Hac Vice

So Ordered

s/ Thomas W. McGee III, Judge Code 2786