

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge

Appellate Case No. 2014-000175
Circuit Court Case No. 2012-CP-10-1332

71488

BETTY FISHER, as Real Representative
for Alice Shaw-Baker.....Appellant

v.

Bessie Huckabee, Kay Passailague Slade,
Sandra Byrd, and Peter Kouten, and Does 1 through 100Defendant

Of whom Bessie Huckabee, Kay Passailague Slade, Sandra Byrd, and Peter Kouten are the
Respondents.

**MOTION BY LOCAL COUNSEL
JOHN HUGHES COOPER, ESQUIRE
REQUESTING ADMISSION OF LISA FISHER, ESQUIRE
AS PRO HAC VICE**

JOHN HUGHES COOPER, ESQUIRE
1476 Ben Sawyer Blvd. Ste. 7
Mount Pleasant, SC 29464
shiplaw@jhcooper.com
843-883-9099; fax 843-883-9335
Local Counsel for Appellant

RECEIVED

MAR 06 2014

SOUTH CAROLINA COURT OF APPEALS

COMES NOW Local Counsel John Hughes Cooper, Esquire, for Appellant Betty Fisher, as Real Representative for Alice Shaw Baker, and respectfully move to have Lisa Fisher, Esquire, an Attorney duly licensed in California, admitted to act as Pro Hac Vice pursuant to the local rules of this Court and Rule 404 of the South Carolina Appellate Rules in this case.

In support thereof, the Movant Local Counsel John Hughes Cooper (“Movant”) would show:

1. Lisa Fisher is a member in good standing of the bar of the highest court of the State of California and before the United States Supreme Court.
2. Movant is an attorney and founding partner of the law firm, JOHN HUGHES COOPER, P.C., 1476 Ben Sawyer Blvd. Ste. 7; Mount Pleasant, SC 29464; a member in good standing with the South Carolina Bar (SC Bar No. 1387); and a resident of the State of South Carolina.
3. Lisa Fisher is handling this matter in association with John Hughes Cooper of the law firm JOHN HUGHES COOPER, P.C.
4. Lisa Fisher agrees to be subject to and abide by the ethical standards governing the practice of law before this court.
5. Local Counsel has worked with Ms. Fisher throughout this case. She has previously filed two other applications for admission as pro hac vice in related

matters, Circuit Court nos. 2009-CP-10-3010 and 2012-CP-10-1332. These orders were granted on 6/17/2009 and 3/26/2011, respectively.

6. This motion is supported by the attached Verified Application for Admission Pro Hac Vice, a copy of which has been served by mail on the South Carolina Supreme Court office of Bar Admissions, along with a \$250.00 check made payable to the South Carolina Supreme Court, pursuant to Rule 404 of the South Carolina Appellate Court Rules.

THEREFORE, Movant prays for an Order of this Court permitting the appearance of Lisa Fisher, Esquire, pro hac vice in this action as counsel for Appellant Betty Fisher, as Real Representative for Alice Shaw Baker

~~February~~ March 3, 2014

RESPECTFULLY SUBMITTED,
JOHN HUGHES COOPER, P.C.

By: 

JOHN HUGHES COOPER, ESQUIRE

Federal Court ID 298

South Carolina Bar 1387

State Bar of Georgia 185986

1476 Ben Sawyer Blvd. Ste. 7

Mount Pleasant, SC 29464

shiplaw@jhcooper.com

843-883-9099; fax 843-883-9335

and

LISA FISHER, ESQUIRE

Pro Hac Vice

c/o JOHN HUGHES COOPER, P.C.

1476 Ben Sawyer Blvd. Ste. 7

Mount Pleasant, SC 29464

843-883-9099; fax 843-883-9335

ATTORNEYS FOR APPELLANT

Other Counsel of Record:

Peter A. Kouten, Esquire
Kouten Law Firm, LLC
P.O. Box 340
John's Island, SC 29457

W. Westbrook Wills III, Esquire
38 Broad Street Ste. 200
Charleston, SC 29401

AFFIDAVIT OF JOHN HUGHES COOPER, ESQ.

PERSONALLY APPEARED before me JOHN HUGHES COOPER, ESQUIRE, who being first duly sworn, stated as follows:

1. My name is John Hughes Cooper, Esquire, and I am over the eighteen and of sound mind.
2. I have personal knowledge of the matters set forth herein and if called and sworn to testify, I could and would competently do so.
3. I am an active member in good standing of the bar of this Court. I am an attorney and founding partner of the law firm, JOHN HUGHES COOPER, P.C., 1476 Ben Sawyer Blvd. Ste. 7; Mount Pleasant, SC 29464; a member in good standing with the South Carolina Bar (SC Bar No. 1387); and a resident of the State of South Carolina.
4. I respectfully request that this court admit pro hac vice, Lisa Fisher, Esquire, as co-counsel in the above matter. I am aware that Ms. Fisher is an attorney admitted to practice and currently in good standing in the California Courts and the Supreme Court of the United States. She is not admitted to the bar of this court.
5. I am aware that the local rules of this court require that an active South Carolina attorney in good standing move the court for admission of counsel from another jurisdiction, to act as Pro Hac Vice.
6. I am aware that Ms. Fisher is an attorney in good standing of the bar of the State of California. I believe her to be an attorney of good character competent to act on behalf of Appellant. I will continue to participate in the preparation and presentation of the case listed above as required by Rule 404.

7. While she is not admitted to the bar of this court, she is familiar with the law, statute, and rules of the State of South Carolina. I have observed Ms. Fisher to comply with the South Carolina Rules of Professional Conduct. Further, she has filed a Verified Application for Admission Pro Hac Vice in the State of South Carolina in compliance with the rule. (Attached hereto is a true and correct copy of said application marked as Exhibit A)

8. I have worked with Ms. Fisher throughout this case. She has always acted in an appropriate and ethical manner. She has previously filed two other applications for admission as pro hac vice in related matters, Circuit Court nos. 2009-CP-10-3010 and 2012-CP-10-1332. These orders were granted on 6/17/2009 and 3/26/2011, respectively.

FURTHER, AFFIANT SAYENT NAUGHT

By: _____

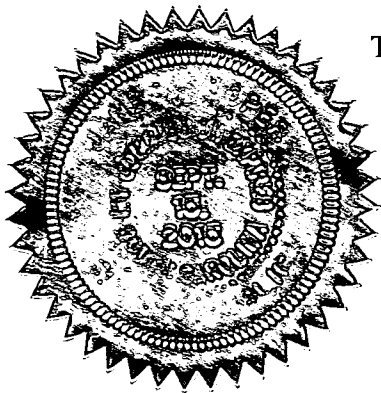
John Hughes Cooper, Esquire

Subscribed and sworn to before me

This 3rd day of ~~February~~ ^{March}, 2014

Jane S. Cooper
JANE S. COOPER

My Commission Expires: 9-15-2015



THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge

Appellate Case No. 2014-000175
Circuit Court Case No. 2012-CP-10-1332

BETTY FISHER, as Real Representative
for Alice Shaw-Baker.....Appellant

v.

Bessie Huckabee, Kay Passailague Slade,
Sandra Byrd, and Peter Kouten, and Does 1 through 100Defendant

Of whom Bessie Huckabee, Kay Passailague Slade, Sandra Byrd, and Peter Kouten are the
Respondents.

PROOF OF SERVICE

I certify that I have served the **MOTION BY LOCAL COUNSEL JOHN HUGHES
COOPER, ESQUIRE REQUESTING ADMISSION OF LISA FISHER, ESQUIRE
AS PRO HAC VICE** on the following counsel and parties by depositing a copy of it in the
United States Mail, postage prepaid, on ~~February~~ ^{March} 3, 2014, addressed as follows:

//

RECEIVED
MAR 06 2014
SC Court of Appeals

W. Westbrook Wills III, Esquire
38 Broad Street Ste. 200
Charleston, SC 29401
(Attorney for Bessie Huckabee, Kay
Passailague Slade,
Sandra Byrd)

Peter A. Kouten, Esquire
Kouten Law Firm, LLC
P.O. Box 340
John's Island, SC 29457

(Attorney Pro Se and Attorney for Bessie
Huckabee, Kay Passailague Slade,
Sandra Byrd)

~~February~~ March 3, 2014

RESPECTFULLY SUBMITTED,

JOHN HUGHES COOPER, P.C.

By: 
JOHN HUGHES COOPER, ESQUIRE

Federal Court ID 298
South Carolina Bar 1387
State Bar of Georgia 185986

1476 Ben Sawyer Blvd. Ste. 7
Mount Pleasant, SC 29464
shiplaw@jhcooper.com
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and
LISA FISHER, ESQUIRE
Pro Hac Vice
c/o JOHN HUGHES COOPER, P.C.
1476 Ben Sawyer Blvd. Ste. 7
Mount Pleasant, SC 29464
843-883-9099; fax 843-883-9335

ATTORNEYS FOR APPELLANT

**VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE*
IN THE STATE OF SOUTH CAROLINA**

Betty Fisher, as Real Representative
for Alice Shaw Baker, Appellant

2014-000175

The South Carolina Court of Appeals

Plaintiff

Case No.

Court

vs.

Bessie Huckabee, Kay Passailaigue Slade,
Sandra Byrd, Peter Kouten, and Does 1
through 100,

Mailing Address of Court: 1015 Sumter Street
Columbia, SC
29201

Defendant

Comes now Lisa Fisher, applicant herein, and respectfully represents the following:

1. Applicant resides at:

Law Offices of Lisa Fisher; PO Box 91112

Street Address

Long Beach

Los Angeles

CA

90809-1112

City

County

State

Zip Code

562-965-3267

Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of)

Law Offices of Lisa Fisher, with offices at, at

PO Box 91112

Street Address

Long Beach

Los Angeles

CA

90809-1112

City

County

State

Zip Code

562-965-3267

866-610-4371

Telephone

Fax Number

3. Applicant has been retained personally or as a member of the above named law firm by

Betty Fisher to provide legal representation in connection with the above case now pending before the above named court of the State of South Carolina.

4. Since December of 1997, applicant has been, and presently is, a

member in good standing of the bar of the highest court of the District of Columbia or the State of California where applicant regularly practices law. Attached is a certificate of good standing.

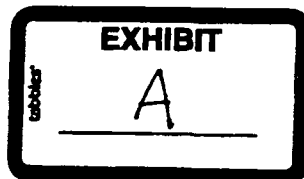
5. Applicant has been admitted to practice before the following courts: (List all of the following courts

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.)

Court:

Date Admitted:

Court:	Date Admitted:
Supreme Court of The United States	03-19-2001
California State, Appellate and Supreme Courts	12-1997
United States District Court, Central District	12-1997
United States District Court, Southern District	1997



Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below:
(List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

Not Applicable

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court, date):

Not Applicable

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

Not Applicable

8. Applicant never has had any certificate or privilege to appear and practice before any administrative body suspended or revoked, except as provided below (give particulars, e.g., date, administrative body, date of suspension and reinstatement):

Not Applicable

9. Local counsel of record associated with applicant in this case is John Hughes Cooper, Esquire, of the John Hughes Cooper, P.C. law firm, which has offices at:

1476 Ben Sawyer Blvd, Ste. 7

Street Address

Mount Pleasant

Charleston

SC

29464

City 843-883-9099

County

State

Zip Code

Telephone

If applicable list all other firms/attorneys you are associated with in this matter

Not Applicable

10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

1. Betty Fisher v. Bessie Huckabee et al In re Alice Shaw Baker; 2009-CP-10-3010; Petition for Writ before Sup. Court; Order granted 6/17/2009; Local Counsel: John Hughes Cooper, Esq

2. Betty Fisher as Real Representative v. Bessie Huckabee et al; 2012-CP-10-1332; Order granted 03/26/2011; Local Counsel: John Hughes Cooper, Esq

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant respectfully requests to be admitted to practice in the above named court for this case only.

DATED this 24th day of February, 2014

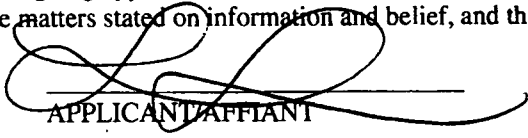
Lisa Fisher, APPLICANT

VERIFICATION

STATE OF California

COUNTY OF Los Angeles

I, Lisa Fisher, 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.


APPLICANT/AFFIANT

Subscribed and sworn to before me this _____ day of _____, 20____.

see attached Jurat

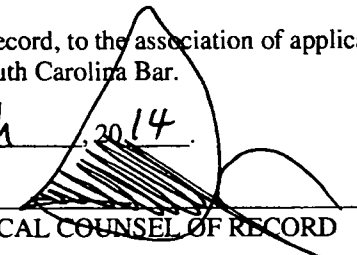
Notary Public for the State of _____

My Commission Expires: _____

LOCAL COUNSEL CONSENT

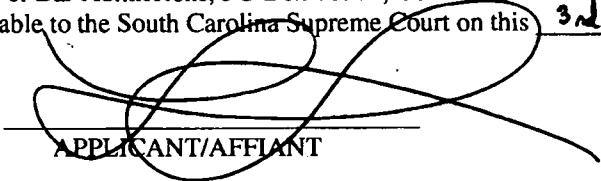
I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 3rd day of March, 2014.


LOCAL COUNSEL OF RECORD

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this 3rd day of March, 2014.


APPLICANT/AFFIANT

State of California
County of Los Angeles

Subscribed and sworn to (or affirmed) before me on this 24th
day of February, 2014, by Lisa Fisher

proved to me on the basis of satisfactory evidence to be the
person(s) who appeared before me.

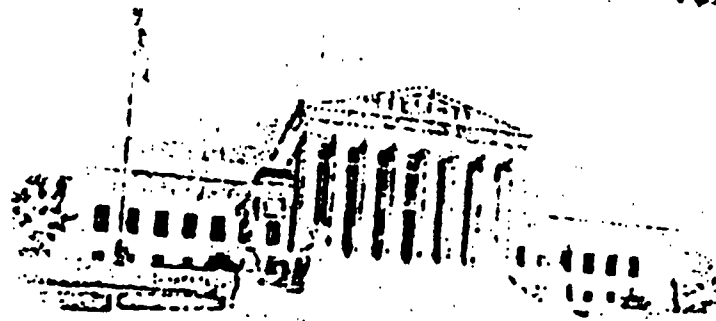


(Seal)

Signature

A large, stylized handwritten signature in black ink, written over a horizontal line. The signature is cursive and appears to read "Angel Fermin Sanchez".

Supreme Court of the United States of America



Lisa Fisher

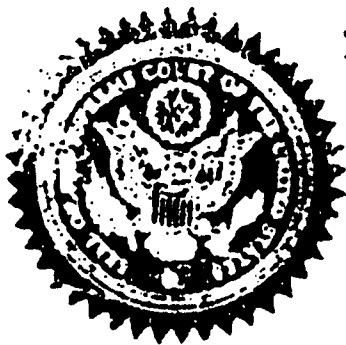
of Long Beach, State of California

was on motion filed made to the Court in this behalf by

Frederick G. Stabach

duly admitted and qualified as an Attorney and Counselor of the Supreme Court of the United States on the nineteenth day of March, in the year of our Lord two thousand one and of the Independence of the United States of America the two hundred and twenty-fifth.

In testimony whereof as Clerk of said Court, I hereunto set my hand and affix the seal of the Court in Washington, D.C. this nineteenth day of March, 2001.



William T. Duter
Clerk of the Supreme Court of the U.S.