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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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MAR 21 2014

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Alison Renee Lee, Circuit Court Judge

Case No. 2011-CP-40-6103

Bank of New York Mellon Trust  
Company, National Association f/k/a  
The Bank of New York Trust  
Company, N.A. as successor to JP  
Morgan Chase Bank N.A. s/b/m Bank  
One National Association as Trustee  
for RAMP 2002RS5,

Plaintiff,

v.

Chartreuse Grier, Palmetto Health  
Alliance; and Palmetto Richland  
Memorial,

Defendants.

Chartreuse Grier,

Appellant,

v.

Nationwide Property & Casualty  
Insurance Company; and Tonya D.  
Parks,

Respondents.

MOTION FOR ADMISSION *PRO HAC VICE*

The undersigned local counsel hereby moves, together with the Verified Application for Admission for *Pro Hac Vice* attached hereto, that Michael Geoffrey Wimer be admitted *pro hac vice* as associate counsel in the above-captioned case.

As local counsel, I understand that:

1. I will personally sign and include my South Carolina Bar attorney identification number on any document that I serve or file in this court; and

2. All 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 filings 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 any subsequent proceedings in this matter, and I will be prepared to actively participate if necessary.

WHEREFORE, the Appellant prays for an order of this Court admitting Michael Geoffrey Wimer *pro hac vice* as associate counsel in this case.

March 17, 2014



Sarah E. Brown (SC Bar #81743)  
M. Allison Moon (SC Bar #73717)  
MOON LAW FIRM  
1 Augusta Street, Suite 301 (29601)  
P.O. Box 3785 (29608)  
Greenville, South Carolina  
Office (864) 217-1595  
Fax (864) 551-2085

Attorneys for Appellant, Chartreuse  
Grier.

Other Counsel of Record:

Alana Odom Williams, Esq.  
Jay T. Thompson, Esq.  
Nelson Mullins Riley & Scarborough LLP  
1320 Main Street/17<sup>th</sup> Floor  
P.O. Box 11070 (29211-1070)  
Columbia, SC 29201  
Office (803) 255-9300

Attorneys for Respondents, Nationwide Property & Casualty Insurance Company and Tonya D. Parks.

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

Bank of NY Mellon Trust  
Plaintiff

2013-002403  
Case No.

SC Court of Appeals  
Court

vs.

Charitreae Grier  
Defendant

Mailing Address of Court: PO Box 11629  
Columbia, SC 29211

Comes now Michael G. Wimer, applicant herein, and respectfully represents the following:

1. Applicant resides at:

22 Robinhood Rd.

Street Address Ashville Buncombe North Carolina 28804  
City County State Zip Code  
Telephone 828-777-0991

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

Wimer & Associates, P.C. aka: Ashville Law Group, with offices at, at  
349 Haywood Rd.

Street Address Ashville Buncombe NC 28806  
City County State Zip Code  
Telephone 828-350-9799 Fax Number 828-350-9894

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

Charitreae Grier 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 April of 2001, 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 North Carolina 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:

<u>see attached</u>	

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.)

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):

Complaint filed by adverse party in litigation July '11 - not referred to disciplinary committee.

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):

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):

9. Local counsel of record associated with applicant in this case is M. Allison Mann of the Mann Law Firm law firm, which has offices at:

1 Augusta St.

Street Address

Greenville

Greenville

SC

29608

City

County

State

Zip Code

864-271-1595

Telephone

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

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).

The Travelers Home's Marine Insur. Co. v. Rudy Pope, et al., settled in 2012, May 9, 2011, Allison Mann, application granted. Federal Court.

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 14th day of March, 20 24.

M. Allison Mann

APPLICANT

VERIFICATION

STATE OF North Carolina

COUNTY OF Buncombe

I, Michael G. Wimer, 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.

Michael G. Wimer

APPLICANT/AFFIANT

Subscribed and sworn to before me this 14 day of March, 2014.

Natalie J. Hoffman  
Notary Public for the State of North Carolina

NATALIE J HOFFMAN  
NOTARY PUBLIC  
HAYWOOD COUNTY, NC  
My Commission Expires 11-1-2015

My Commission Expires: 11-1-2015

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 27<sup>th</sup> day of February, 2014.

[Signature]  
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 14 day of March, 2014.

Michael G. Wimer  
APPLICANT/AFFIANT

Additional Bar Membership

State Courts of Texas

State Courts of North Carolina

US District Court for the Western District of North Carolina

US District Court for the Eastern District of North Carolina

US District Court for the Middle District of North Carolina

US District Court for the Northern District of Texas

Fourth Circuit Court of Appeals

Eleventh Circuit Court of Appeals

US Supreme Court

# The North Carolina State Bar

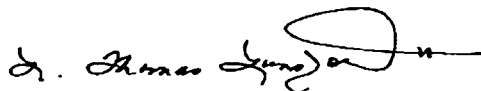
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I, I. Thomas Lunsford, II, Secretary of the North Carolina State Bar, do hereby certify that Mr. Michael Geoffrey Wimer (29835) was licensed to practice law by the State of North Carolina on April 20, 2001. Said lawyer is presently an active member of the North Carolina State Bar and is eligible to practice law in North Carolina. Said lawyer is not subject to a pending order of administrative or disciplinary suspension. Said lawyer's financial account with the State Bar is current. Therefore, said lawyer is in good standing with the North Carolina State Bar.

This certificate is issued without regard to prior discipline, or any unresolved disciplinary charges or grievances.

Given over my hand and the Seal of the North Carolina State Bar, this

3<sup>rd</sup> day of March, 2014.



---

Secretary of the North Carolina State Bar

# MOONLAW

1 Augusta Street (29601)  
Post Office Box 3785  
Greenville, South Carolina 29608

Tel (864)271-1595  
Fax (864)551-2085  
info@moonlawsc.com

17 March 2014  
VIA U.S. MAIL

The Honorable Jenny Abbott Kitchings  
Clerk of the South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: Bank of New York Mellon Trust v. Chartreuse Grier  
Appellate Case No.: 2013-002403

Dear Ms. Kitchings:

Please find enclosed herein for filing the original and six (6) copies of the Motion for *Pro Hac Vice* in this matter as well as a check in the amount of \$25.00 for the filing fee. Also enclosed for filing is the original Proof of Service on all other parties.

If you have any questions or concerns, please do not hesitate to contact me. I greatly appreciate the assistance of your office.

Sincerely,



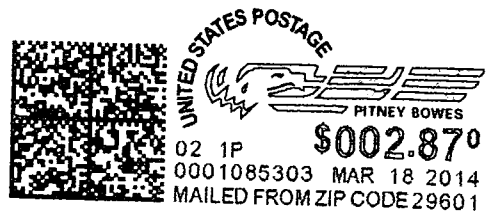
Sarah Brown  
sarah@moonlawsc.com

Cc: Alana Odom Williams, Esq.  
Jay T. Thompson, Esq.

**RECEIVED**

MAR 21 2014

**SC Court of Appeals**



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MAR 21 2014

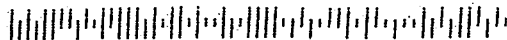
**SC Court of Appeals**

**MOONLAW**

1 Augusta Street, Suite 301  
Greenville, SC 29601

**The Honorable Jenny Abbott Kitchings  
Clerk of the South Carolina Court of  
Appeals**

**P.O. Box 11629  
Columbia, SC 29211**



**ASHEVILLE  
LAW GROUP**  
WIMER & ASSOCIATES PC

349 Haywood Road  
Asheville, North Carolina 28806  
*nhoffman@ashevilllawgroup.com*

Telephone  
(828) 350-9799

Facsimile  
(828) 350-9894

March 14, 2014


Clerk, Court of Appeals  
PO Box 11629  
Columbia, SC 29211

Re: Bank of New York Mellon Trust v. Chartrease Grier  
Appellate Case No.: 2013-002403

Dear Sir or Madame:

Please find enclosed an original application for admission pro hac vice with an original certificate of good standing. A copy of the application, along with the filing fee has been submitted to the South Carolina Supreme Court Office of Bar Admissions. Thank you.

Sincerely,



Natalie J. Hoffman  
Paralegal to Michael G. Wimer

Enclosure

**RECEIVED**

MAR 18 2014

**SC Court of Appeals**

VERIFIED APPLICATION FOR ADMISSION P. HAC VICE  
IN THE STATE OF SOUTH CAROLINA

Bank of NY Mellon Trust 2013-002403 SC Court of Appeals  
Plaintiff Case No. Court

vs.

Chartrease Grier Mailing Address of Court: PO Box 11629  
Defendant Columbia, SC 29211

Comes now Michael G. Wimer, applicant herein, and respectfully represents the following:

1. Applicant resides at:

22 Robinhood Rd.  
Street Address  
Asheville Buncombe North Carolina 28804  
City County State Zip Code  
828-777-0991  
Telephone

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

Wimer & Associates, P.C. db/a Asheville Law Group, with offices at, at  
349 Haywood Rd.  
Street Address  
Asheville Buncombe NC 28806  
City County State Zip Code  
828-350-9799 828-350-9894  
Telephone Fax Number

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

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Court:	Date Admitted:
<u>see attached</u>	

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864-271-1595

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The Travelers Home & Marine Insur. Co. v. Judy Pope, et al., settled in 2012, May 9, 2011; Allison Moon, application granted, Federal Court.

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DATED this 14th day of March, 20 24.

M. Allison Moon

APPLICANT

VERIFICATION

STATE OF North Carolina  
COUNTY OF Buncombe

I, Michael G. Wimer, 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.

[Signature]  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 14 day of March, 2014.

Natalie J. Hoffman  
Notary Public for the State of North Carolina

NATALIE J HOFFMAN  
NOTARY PUBLIC  
HAYWOOD COUNTY, NC  
My Commission Expires 11-1-2015

My Commission Expires: 11-1-2015

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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 27<sup>th</sup> day of February, 2014.

[Signature]  
LOCAL COUNSEL OF RECORD

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[Signature]  
APPLICANT/AFFIANT

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SC Court of Appeals

Additional Bar Membership

State Courts of Texas

State Courts of North Carolina

US District Court for the Western District of North Carolina

US District Court for the Eastern District of North Carolina

US District Court for the Middle District of North Carolina

US District Court for the Northern District of Texas

Fourth Circuit Court of Appeals

Eleventh Circuit Court of Appeals

US Supreme Court

# The North Carolina State Bar

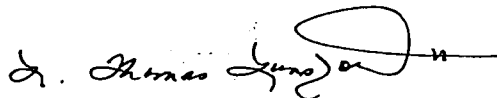
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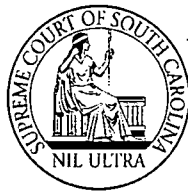
Given over my hand and the Seal of the North Carolina State Bar, this

3<sup>rd</sup> day of March, 2014.



---

Secretary of the North Carolina State Bar



# The Supreme Court of South Carolina

DANIEL E. SHEAROUSE  
CLERK OF COURT

BRENDA F. SHEALY  
CHIEF DEPUTY CLERK

POST OFFICE BOX 11330  
COLUMBIA, SOUTH CAROLINA 29211  
TELEPHONE: (803) 734-1080  
FAX: (803) 734-1499

April 3, 2014

Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

RE: Bank of NY Mellon Trust v. Chartrease Grier  
Case No: 2013-002403

Dear Clerk of Court:

I certify that the Office of Bar Admissions has received a verified application requesting Michael G. Wimer be admitted *pro hac vice* in the above matters. The \$250 filing fee for the applicant for the above case has been paid.

Yours truly,

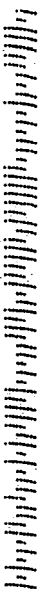
*Dayle B. Watts 1st*  
Deputy Clerk for Bar Admissions

GBW/st

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APR 04 2014

**SC Court of Appeals**



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**The Supreme Court of South Carolina**

**DANIEL E. SHEAROUSE, CLERK OF COURT**

POST OFFICE BOX 11330  
COLUMBIA, SOUTH CAROLINA 29211

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04/03/2014



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Clerk of Court

South Carolina Court of Appeals

P.O. Box 11629

Columbia, SC 29211

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APR 04 2014

**SC Court of Appeals**

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