

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM AIKEN COUNTY
Court of Common Pleas

The Honorable Doyet A. Early, III, Circuit Court Judge

Case No. 2012-CP-02-01772

RECEIVED

APR 03 2014

SC Court of Appeals

11781

Coves Darden, LLC

Appellants

VS

Francisco Jose Garcia Ibanez, Dori Derr,
and Half Moon Stables, LLC

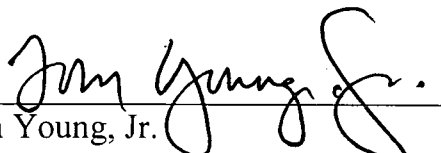
Respondents

**MOTION FOR ADMISSION
PRO HAC VICE OF JAMES M. DERR**

The undersigned Tom Young, Jr., counsel of record for Defendants Francisco Jose Garcia Ibanez, Dori Derr and Half Moon Stables, LLC, hereby petitions this Court for an Order admitting *pro hac vice* James M. Derr of the United States Virgin Islands Bar to appear and to participate in this case in association with Tom Young, Jr. of Law Offices of Tom Young, Jr., PC who is in good standing with the South Carolina Bar.

Mr. Derr is admitted to practice before a court of last resort in the United States Virgin Islands and he is a member in good standing with the Supreme Court of the United States Virgin Islands. In support of this Petition, an Application for Admission *Pro Hac Vice* is being filed with

this motion and a copy has been filed with the South Carolina Supreme Court Office of Bar Admissions with the required fee on March 27, 2014.



Tom Young, Jr.
LAW OFFICES OF TOM YOUNG, JR., PC
Post Office Box 651
409 Park Avenue, SW
Aiken, South Carolina 29802
803-649-0000

Attorneys for the Appellant

Date: 3/31/14

Other Counsel of Record:

M. Baron Staton
Attorney for Appellant
STANTON LAW OFFICES, P.A.
PO Box 245
Columbia, South Carolina 29202
803-929-1484

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM AIKEN COUNTY
Court of Common Pleas

The Honorable Doyet A. Early, III, Circuit Court Judge

Case No. 2012-CP-02-01772

RECEIVED

APR 03 2014

SC Court of Appeals

Coves Darden, LLC

Appellants

vs

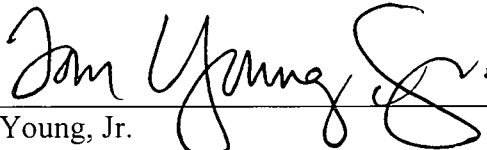
Francisco Jose Garcia Ibanez, Dori Derr,
and Half Moon Stables, LLC

Respondents

CERTIFICATE OF SERVICE

I, Tom Young, Jr., do hereby certify that I have, on March 31, 2014, serviced the foregoing **Motion for Admission Pro Hac Vice of James M. Derr** upon Appellant or attorney(s) for the Appellant by causing a copy thereof to be mailed with proper postage to the address indicated below:

M. Baron Stanton, Esquire
Attorney for Appellant
P.O. Box 245
Columbia, SC 29202



Tom Young, Jr.

Date: 3/31/14

LAW OFFICES OF TOM YOUNG, JR., PC

TOM YOUNG, JR.
ANDREW WALDEN



POST OFFICE BOX 651
409 PARK AVENUE SW
AIKEN, SC 29802
OFFICE: (803) 649-0000
FAX: (803) 649-7005

WWW.TOMYOUNGLAW.COM

March 31, 2014

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeal
Post Office Box 11629
Columbia, South Carolina 29211

In re: Coves Darden v Francisco Ibanez
Appellate Case No. 2014-000339

Dear Ms. Kitchings:

Please find enclosed the original and six copies of our Motion for Admission Pro Hac Vice of James M. Derr along with our proof of service and a check in the amount of \$25.00 for the filing fee.

If you have any questions, please do not hesitate to contact our office at (803) 649-0000. Thank you for your assistance in this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Tom'.

Tom Young, Jr.

TY:esh
Enclosures

c: M. Baron Stanton, Esquire
James M. Derr, Esquire

RECEIVED

APR 03 2014

SC Court of Appeals