

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

Denise Wright

Plaintiff

2011-CP-40-4068

Case No.

SC Court of Appeals

Court

vs.

Mailing Address of Court: South Carolina Court of Appeals
PO Box 11629
Columbia, South Carolina 29211

PRG Real Estate Management, Inc.,
Franklin Pineridge Associates, Karen
Campbell Individually and in her
Representative Capacity as an Agent of
PRG Real Estate Management

Defendant

Comes now Deborah G. Casey, applicant herein, and respectfully represents the following:

1. Applicant resides at:

2616 Windsor Crescent Court

Street Address

Charlotte

City

(704) 366-5349

Telephone

Mecklenburg

County

North Carolina

State

28226

Zip Code

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

Hood & Felder, LLC, with offices at, at

1539 Health Care Drive

Street Address

Rock Hill

City

(803) 327-7800

Telephone

York

County

South Carolina

State

(803) 328-5656

Fax Number

29732

Zip Code

3. Applicant has been retained personally or as a member of the above named law firm by Appellant 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 August of 1991, 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:

All courts in the State of North Carolina	September, 1991
Fourth Circuit, Western District of North Carolina	September, 1991
Fourth Circuit, Middle District of North Carolina	September, 1991

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SC SUPREME COURT

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.)

None

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):

None

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):

None

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):

None

9. Local counsel of record associated with applicant in this case is Jordan C. Calloway, of the McGowan, Hood & Felder law firm, which has offices at:

1539 Health Care Drive

Street Address

York

County

Rock Hill

City

South Carolina

State

29732

Zip Code

Telephone

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

N/A

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).

Please see attached.

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 8th day of January, 2014.

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Deborah G. Casey

APPLICANT

VERIFICATION

STATE OF South Carolina)

COUNTY OF York)

I, Deborah G. Casey, 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.

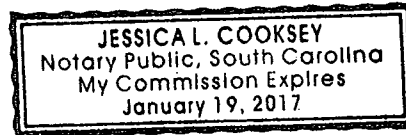
Deborah G. Casey
APPLICANT/AFFIANT

Subscribed and sworn to before me this 8th day of January, 2014.

Jessica L. Cooksey

Notary Public for the State of South Carolina

My Commission Expires: 01/19/2017



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 _____ day of January, 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 8th day of January, 2014.

Deborah G. Casey
APPLICANT/AFFIANT

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.

(A) Case Name: Tracy Cinicola v. PRG Real Estate Management, Inc., Franklin Pineridge Associates, Jane Doe Individually and in her Capacity as an Agent of PRG Real Estate Management

Case Number: 2012-CP-40-586

Status of

Litigation: Case is under a tolling agreement.

Date of

Application: July 10, 2012

Local

Counsel: S. Randall Hood, Esquire

Application has been granted.

(B) Case Name: Denise Wright v. PRG Real Estate Management, Inc., Franklin Pineridge Associates, Karen Campbell, Individually and in her Representative Capacity as an Agent of PRG Real Estate Management

Case Number: 2011-CP-40-4068

Status of

Litigation: Case is on appeal

Date of

Application: July 18, 2012

Local

Counsel: S. Randall Hood, Esquire

Application has been granted.

(C) Case Name: Sabino Perez and Luz Maria Amezquita, individually, and as the parents, natural guardians and next friend of Princess Amezquita, a minor under the age of eighteen (18) v. AMISUB of South Carolina, Inc. d/b/a Piedmont Medical Center, Community Medicine Foundation, Inc. d/b/a North Center medical Center; Shirley A. Walgamuth-Owens, CNM; Rock Hill Gynecology & OB Services; and Ansley Lower Hilton, MD

Case Number: 2011-CP-46-01348

Status of

Litigation: Depositions of experts pending

Date of

Application: October 15, 2012

Local

Counsel: S. Randall Hood, Esquire

Application has been granted.

(D) Case Name: Elizabeth Hope Rainey, as the appointed Guardian ad Litem to Owen Carduff, a minor v. Charlotte-Mecklenburg Hospital Authority d/b/a Carolinas Medical Center, South Carolina Department of Social Services, Bruce Bryant, as the Constitutional Office of the Sheriff of York County

Case Number: 2011-CP-46-04508

Status of

Litigation: Case is on appeal

Date of

Application: November 9, 2012

Local

Counsel: S. Randall Hood, Esquire

Application has been granted.

(E) Case Name: Wilbur L. Judy, Jr., individually and as the Personal Representative of the Estate of Kyle Judy, deceased v. The Regional Medical Center of Orangeburg and Calhoun Counties, d/b/a the Regional Medical Center of Orangeburg; ABC Hospitalist Group, Casey M. McMillan, MD, John Doe, M.D., #1-4, and Calhoun County EMS

Case Number: 2013-CP-38-00316

Status of

Litigation: Discovery

Date of

Application: October 4, 2013

Local

Counsel: Ashley White Creech, Esquire

Application has been granted.

(F) Case Name: Harold Douglas Butts, individually and as Personal Representative of the Estate of Mildred Butts, deceased v. HealthSouth Corporation and Piedmont HealthSouth Rehabilitation, LLC d/b/a HealthSouth Rehabilitation Hospital, Piedmont Rehabilitation Medicine, PA, Timothy M. Murphree, MD and Kierney E. Jackson, PA

Case Number: 2012-CP-46-01136

Status of

Litigation: Discovery

Date of

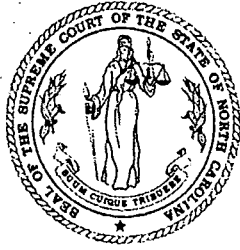
Application: October 4, 2013

Local

Counsel: S. Randall Hood, Esquire

Application has been granted.

Supreme Court OF THE STATE OF NORTH CAROLINA



I, Christie S. Cameron Roeder, Clerk of the Supreme Court of North Carolina, do hereby certify that on August 23, 1991, license to practice as an Attorney and Counselor at Law in all the Courts of this State was issued by the North Carolina Board of Law Examiners to

DEBORAH G. CASEY

according to the certified list of licentiates reported by the Secretary of said Board and filed in my office as required by statute.

To the date of this certificate, no order revoking said license has been filed with this Court and no order suspending same is in effect.

WITNESS my hand and the Seal of the Supreme Court of North Carolina at office in Raleigh, this January 2, 2014.



Christie S. Cameron Roeder

Christie S. Cameron Roeder
Clerk of the Supreme Court
of the State of North Carolina