

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

S. Jackson Kimball, Special Circuit Court Judge

Case No. 2011-CP-46-4508

72351

Elizabeth Hope Rainey, as the Appellant
Appointed Guardian ad Litem to
Owen C., a minor

v.

Charlotte-Mecklenburg Hospital
Authority d/b/a Carolinas Medical
Center; South Carolina Department of
Social Services and Bruce Bryant, as
the Constitutional Office of the Sheriff
of York County, the York County
Sheriff's Department, and York County

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SC Court of Appeals

Of Whom

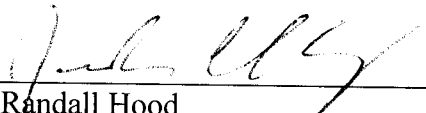
Charlotte-Mecklenburg Hospital
Authority d/b/a Carolinas Medical
Center is the Respondent.

MOTION FOR ADMISSION *PRO HAC VICE*

Jordan C. Calloway, counsel for Appellant, licensed to practice law in South Carolina, requests that this Court admit attorney Deborah G. Casey. Ms. Casey has been admitted to practice law in the State of North Carolina and in the U.S. District Courts for the Middle and Western Districts of North Carolina since September 1991. She is also a member in good

standing with the State Bar of North Carolina. She is not subject to any suspension or disbarment proceedings and has never had any admission *pro hac vice* denied or revoked. Applicant also agrees to comply with the applicable laws, statutes, and rules of the State of South Carolina.

Accordingly, Appellant respectfully requests that the court admit Ms. Casey *pro hac vice*.


S. Randall Hood
Jordan C. Calloway
Lara Pettiss Harrill
McGowan, Hood & Felder, LLC
1539 Health Care Drive
Rock Hill, SC 29732
(803) 327-7800
(803) 328-5656 (fax)

Duane M. Shaw
Nathan J. Sheldon
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1169 Ebenezer Road
Rock Hill, SC 29732
(803) 329-4200

Gerald Malloy
Malloy Law Firm
108 Cargill Way
Hartsville, SC 29551
(843) 339-3000
(843) 332-4646 (fax)

Attorneys for Appellant

May 28, 2014

Rock Hill, SC

McGowan, Hood & Felder, LLC

Chad A. McGowan (SC,GA,NC)
S. Randall Hood
John G. Felder, Jr.
W. Jones Andrews, Jr.
Jordan C. Calloway
Susan F. Campbell
Ashley White Creech
Christy M. DeLuca (SC,IL)
Lara Pettiss Harrill



Patrick M. Killen
William A. McKinnon (SC,DC)
Daniel "Ernie" Peagler
Robert V. Phillips
Seth Rose
James Stephen Welch*(SC,OK)
Jay F. Wright
Joseph G. Wright, III*
Of Counsel*

Writer's Email: rhood@mcgowanhood.com

October 3, 2012

South Carolina Supreme Court Office of Bar Admissions
PO Box 11330
Columbia, SC 29211

Re: Pro Hac Vice Admission of Deborah G. Casey

Dear SC Supreme Court Clerk:

Please find enclosed an original and two copies of the Verified Application for Admission Pro Hac Vice of Deborah G. Casey and the \$250.00 filing fee. Please return to me a filed copy of the enclosed Application in the enclosed self-addressed stamped envelope. Please contact my office should you have any questions.

Thank you for your time and consideration in this matter.

Sincerely,

A handwritten signature in black ink, appearing to be 'SRH', written over a horizontal line.

S. Randall Hood

SRH:jlc
enclosures

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

Elizabeth Hope Rainey, as the appointed

GAL to Owen Carduff, a minor, 11-CP-46-04508 York County Common Pleas
Plaintiff Case No. Court

vs.
Charlotte-Mecklenburg Hospital Authority

d/b/a Carolinas Medical Center, SCDSS,
The York County Sheriff's Department, et al.
Defendant

Mailing Address of Court: York County Clerk of Court
Post Office Box 649
York, South Carolina 29745

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

1. Applicant resides at:
2616 Windsor Crescent Court
Street Address
Charlotte Mecklenburg North Carolina 28226
City County State Zip Code
(704) 366-5349
Telephone

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 York South Carolina 29732
City County State Zip Code
(803) 327-7800 (803) 328-5656
Telephone Fax Number

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

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 S. Randall Hood, of the McGowan, Hood & Felder, LLC law firm, which has offices at:

1539 Health Care Drive

Street Address

Rock Hill

City

York
County

SC
State

29732
Zip Code

(803) 327-7800

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 3rd day of October, 2012.

Deborah D. 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 3rd day of October, 2012.

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 3rd day of Oct, 2012.

[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 3rd day of October, 2012.

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: Alberta Carter v. Palmetto Health Alliance d/b/a Palmetto Baptist Hospital, Felecia L. Watson, RN, Shanna M. Rozier, RN, Lauren L. Coggiola, RN, Three Rivers Ob/Gyn Associates, P.A., James H. Johnson, M.D., and Christopher T. Hutchinson, M.D.

Case Number: 2012-CP-40-0372

Status of

Litigation: Depositions of parties pending

Date of

Application: January 19, 2012

Local

Counsel: S. Randall Hood, Esquire

Application has been granted.

(B) 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: Depositions of parties pending

Date of

Application: July 10, 2012

Local

Counsel: S. Randall Hood, Esquire

Application has been granted.

(C) 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: Depositions of parties pending

Date of

Application: July 18, 2012

Local

Counsel: S. Randall Hood, Esquire

Application has been granted.

The North Carolina State Bar

I, L. Thomas Lunsford, II, Secretary of the North Carolina State Bar, do hereby certify that Ms. Deborah G. Casey (18137) was licensed to practice law by the State of North Carolina on August 23, 1991. 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

5th day of July, 2012.



A handwritten signature in black ink, which appears to read "L. Thomas Lunsford, II".

Secretary of the North Carolina State Bar

McGowan, Hood & Felder, LLC

Chad A. McGowan (SC,GA,NC)
S. Randall Hood
John G. Felder, Jr.
W. Jones Andrews, Jr.
Jordan C. Calloway
Susan F. Campbell
Ashley White Creech
Ruskin C. Foster
Lara Pettiss Harrill



Whitney Harrison
Patrick M. Killen
William A. McKinnon (SC,DC)
Daniel "Ernie" Peagler
Robert V. Phillips
Seth Rose
James Stephen Welch* (SC,OK)
Joseph G. Wright, III*
Of Counsel*

May 28, 2014

Writer's Email: jcalloway@mcgowanhood.com

V. Claire Allen
Deputy Clerk, South Carolina Court of Appeals
PO Box 11629
Columbia, South Carolina 29211

RE: Elizabeth Hope Rainey v. Charlotte-Mecklenburg Hospital
Appellate Case No.: 2013-002058

Dear Ms. Allen:

I have enclosed original and one copy of a Motion for Admission Pro Hac Vice, along with Proof of Service, for the above-referenced matter. I have also enclosed this firm's check in the amount of \$25.00 to cover the filing fee. Please file the original and return the copy in the enclosed envelope.

By copy of this letter to opposing counsel, I am hereby serving them with a copy of the same.

Thanks for your time and consideration in this matter.

Sincerely,



Jordan Calloway
Attorney for Appellant

cc: Monteith P. Todd, Esq.
Patrick J. Frawley, Esq.

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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

S. Jackson Kimball, Special Circuit Court Judge

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Elizabeth Hope Rainey, as the
Appointed Guardian ad Litem to
Owen Carduff, a minor Appellant

v.

Charlotte-Mecklenburg Hospital
Authority d/b/a Carolinas Medical
Center; South Carolina Department of
Social Services and Bruce Bryant, as
the Constitutional Office of the Sheriff
of York County, the York County
Sheriff's Department, and York County ... Respondents.

PROOF OF SERVICE

The undersigned hereby certifies that on this 28th day of May, 2014, she served counsel for the Defendants with copies of the Motion for Admission Pro Hac Vice in this matter by mailing a copy of the same by United States Mail with first class postage prepaid to the following addresses:

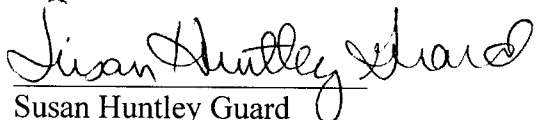
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SC Court of Appeals

Monteith P. Todd, Esquire
Robert E. Horner, Esq.
Sowell, Gray, Stepp & Laffitte, LLC
Post Office Box 11449
Columbia, South Carolina 29211

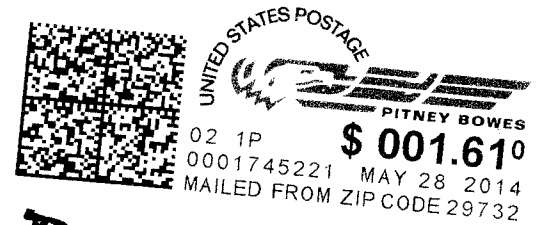
Patrick J. Frawley, Esquire
David Frawley Law Firm
Post Office Box 489
Lexington, South Carolina 29071


Susan Huntley Guard
Paralegal



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1539 Healthcare Drive
Rock Hill, SC, 29732

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