

THE STATE OF SOUTH CAROLINA
In the Supreme Court

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ON WRIT OF CERTIORARI TO GREENVILLE COUNTY
Court of Common Pleas

S.C. SUPREME COURT

G. Edward Welmaker, Circuit Court Judge

Case No. 2010-CP-23-09792
Appellate Case No. 2013-001945

Charles Christopher Williams,

Petitioner,

v.

The State of South Carolina

Respondent.

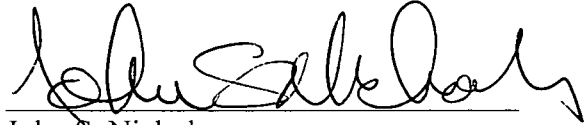
MOTION TO ADMIT COUNSEL PRO HAC VICE

Pursuant to Rule 404(a), SCACR, the undersigned moves the admission pro hac vice of Louis O'Neill of the New York Bar for purposes of signing and filing a brief of amicus curiae on behalf of the Republic of Germany in the case of Charles Christopher Williams v. State of South Carolina, Case No. 201-CP-23-09792, Appellate Tracking No. 2013-001945. Mr. O'Neill is not admitted to practice law in South Carolina; however, he is admitted and authorized to practice law in the highest court of the state of New York.

The undersigned is a regular member of the South Carolina Bar in good standing and has been associated as an attorney of record with Mr. O'Neill. A completed application form specified in Rule 404 (d), with a filing fee and a certificate of good standing attached, is included with this motion.

July 2, 2014

Respectfully Submitted,



John S. Nichols

SC Bar No. 004210

BLUESTEIN, NICHOLS

THOMPSON & DELGADO

Post Office Box 7965

Columbia, South Carolina 29202

(803) 779-7599

(800) 779-8995 (facsimile)

jsnichols@bntdlaw.com

Counsel for Amicus Curiae

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

S.C. SUPREME COURT

Charles Christopher Williams
Plaintiff

2010CP2309792
Case No.

Supreme Court
Court

vs.

Mailing Address of Court: Supreme Court of South Carolina
P.O. Box 11330
Columbia SC 29211

State of South Carolina
Defendant

Comes now Louis O'Neill, applicant herein, and respectfully represents the following:

1. Applicant resides at:
240 E. 10th St., Apt. 7C
Street Address
New York
City
(917) 539-8889
Telephone

County

NY
State

10003
Zip Code

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) White & Case LLP, with offices at, at
1155 Ave. of Americas
Street Address
New York
City
(212) 819-8896
Telephone

County

NY
State
(212) 354-8113
Fax Number

10036
Zip Code

3. Applicant has been retained personally or as a member of the above named law firm by the Federal Republic of Germany 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 September 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 New York 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 New York State courts	09/17/1997
U.S. District Court for the Western District of New York	05/20/2013
U.S. District Court for the Eastern District of New York	09/30/1999
U.S. District Court for the Southern District of New York	09/14/1999
The Supreme Court of the United States	10/30/2000

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 John Nichols, of the Bluestein Nichols Thompson & Delgado, LLC law firm, which has offices at:

1614 Taylor St.
Street Address

County
(803) 779-7599
Telephone

Columbia
City

South Carolina
State

29201
Zip Code

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

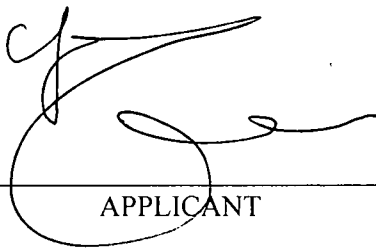
10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

none

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 27th day of JUNE, 2014.



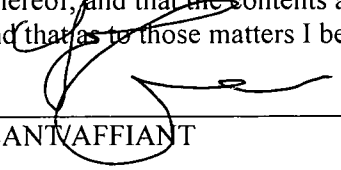
APPLICANT

VERIFICATION

STATE OF New York)

COUNTY OF New York)

I, Louis O'Neill, 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 27th day of June, 20 14.



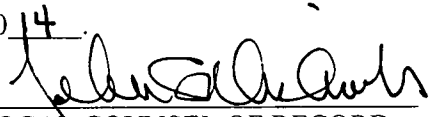
Notary Public for the State of NY

STELLA SANTISTEBAN
Notary Public State of New York
No. 30-4818398
Qualified in Nassau County
Certificate Filed in New York County
Commission Expires Oct. 31, 2014

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 1st day of July 20 14.



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 2^d day of July, 20 14.



APPLICANT/AFFIANT



**Appellate Division of the Supreme Court
of the State of New York
Second Judicial Department**

I, Aprilanne Agostino, Clerk of the Appellate Division of the Supreme Court of the State of New York, Second Judicial Department, do hereby certify that Louis Francis O'Neill, III was duly licensed and admitted to practice as an Attorney and Counselor-at-Law in all the courts of the State, according to the laws of the State and the court rules and orders, on the 17th day of September 1997, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors-at-Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an Attorney and Counselor-at-Law.

In Witness Whereof, I have hereunto set my hand and affixed the seal of said Appellate Division on June 26, 2014.



Aprilanne Agostino

Clerk of the Court

THE STATE OF SOUTH CAROLINA
In the Supreme Court

ON WRIT OF CERTIORARI TO GREENVILLE COUNTY
Court of Common Pleas

G. Edward Welmaker, Circuit Court Judge

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PROOF OF SERVICE

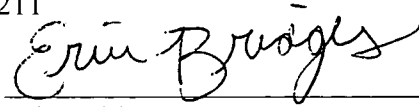
The undersigned hereby certifies that on the date indicated below she served counsel of record with a copy of the *Motion to Admit Counsel Pro Hac Vice* by mailing copies of the same by United States Mail with first class postage prepaid to the following addresses:

Derek J. Enderlin, Esquire
Ross and Enderlin, PA
330 East Coffee Street
Greenville, SC 29601

Robert M. Dudek, Esquire
S.C. Commission on Indigent Defense
Division of Appellate Defense
P.O. Box 11589
Columbia, SC 29211

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Donald J. Zelenka, Esquire
South Carolina Attorney General's Office
P.O. Box 11549
Columbia, SC 29211



Erin Bridges
BLUESTEIN, NICHOLS,
THOMPSON & DELGADO, LLC

July 2, 2014