



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

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August 1, 2014

Richard Sheinis, Esquire
191 Peachtree Street, NE
Suite 2900
Atlanta GA 30303

Re: Angela Parsons v. Jane Smith
Appellate Case No. 2014-001636

Dear Counsel:

This Court has received a notice of appeal in the above mentioned matter, in which you have been named as counsel for one of the parties. Pursuant to Rule 404, SCACR, when an action or proceeding moves from one tribunal to another, the attorney admitted pro hac vice shall immediately provide the new tribunal with a copy of the order granting the pro hac vice admission, and with the name and South Carolina Bar Number of the associated regular member of the South Carolina Bar.

Please provide the above requested documentation within ten (10) days of the date of this letter.

Very truly yours,

V. Claire Allen, Deputy

CLERK

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AUG 11 2014

SC Court of Appeals

STATE OF SOUTH CAROLINA
COUNTY OF FLORENCE

) IN THE COURT OF COMMON PLEAS
) TWELFTH JUDICIAL CIRCUIT
) CIVIL ACTION NO.: 2012-GP-216

FILED

2013 SEP 25 PM 1:40
JOHN REEL-SHEARIN
& G.S.
FLORENCE COUNTY, SC

Angela Parsons,
Plaintiff,

v.

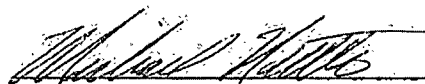
Jane Smith, QHG of South Carolina d/b/a
Carolinas Hospital System, and Carolinas
Hospital System,
Defendants.

ORDER

This matter having come before this Court on Richard N. Sheinis' application to be admitted to practice *pro hac vice* in this matter and assist in the representation of the Defendants in their individual capacities, having read and considered the application, and the counsel for Plaintiff has consented to the same,

IT IS HEREBY ORDERED that Richard N. Sheinis, Esq. be admitted *pro hac vice* to represent the Defendants for this case with Elizabeth Schwartz Corn, Esq. as local counsel for the same.

SO ORDERED, this 25 day of Sept 2013.



Presiding Judge, Court of Common Pleas
Twelfth Judicial Circuit

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Christy Reel Shearin
CLERK OF COURT C.P. & G.S.
FLORENCE COUNTY, S.C.
AUG 11 2014

STATE OF SOUTH CAROLINA)
 COUNTY OF FLORENCE)
 Angela Parsons,)
 Plaintiff,)
 v.)
 Jane Smith, QHG of South Carolina d/b/a)
 Carolinas Hospital System, and Carolinas,)
 Hospital System,)
 Defendants:)

IN THE COURT OF COMMON PLEAS
 TWELFTH JUDICIAL CIRCUIT
 CIVIL ACTION NO.: 2012-CP-210301

FILED
 SEP 16 PM 3:11
 CLERK OF COURT C.P. & G.S.
 FLORENCE COUNTY, S.C.

**MOTION IN SUPPORT OF
 PRO HAC VICE APPLICATION**

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that Richard N. Sheinis, be admitted *pro hac vice* in the above-captioned case as associate counsel. As local counsel, I understand that:

I will personally sign and include my South Carolina state bar identification number on each pleading, motion, discovery procedure, or other document that I serve or file in this court; and

All pleadings and other documents that I file in this case will contain my name, firm name, address and phone number and those of my associate counsel *pro hac vice*; and


Service of all pleadings 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

Unless excused by the court, I will be present at all pretrial conferences, hearings, and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.

[SIGNATURE ON NEXT PAGE]

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 AUG 11 2014
 CLERK OF COURT C.P. & G.S.
 FLORENCE COUNTY, S.C.
 A TRUE COPY
 Sheinis
 SC Court of Appeals

HALL BOOTH SMITH, P.C.


Elizabeth Schwartz Corn, Esq.,
SC Bar No. 71120
40 Calhoun Street, Suite 550
Charleston, SC 29401
Phone: (843) 720-3460
Fax: (843) 720-3458
Email: ecorn@hallboothsmith.com

Attorney for the Defendants

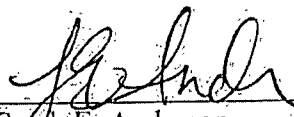
September 12, 2013
Charleston, SC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 12th of September, 2013, a true copy of **Defendants' Motion in Support of Pro Hac Vice Application** was served upon counsel by mailing a copy properly addressed with sufficient postage affixed thereto as follows:

Phoebe Clark, Esq.
Wukela Law Firm
P.O. Box 13057
Florence, SC 29504-3057
Attorney for the Plaintiff

By:


Sarah E. Anderson
Hall Booth Smith, P.C.
40 Calhoun Street, Suite 550
Charleston, SC 29401
Phone: (843) 720-3477
Fax: (843) 720-3458
Email: sanderson@hallboothsmith.com

Legal Assistant to Elizabeth Schwartz Corn

FILED
2013 SEP 16 PM 3:11
CORINNE REEF-SHEARIN
Clerk of Court
FLORENCE COUNTY, SC

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AUG 11 2013
CERTIFIED: A TRUE COPY
Amie Reel Shearin
CLERK OF COURT C.P. & G.S.
FLORENCE COUNTY, S.C.

STATE BAR OF GEORGIA



Lawyers Serving the Public and the Justice System

Mr. Richard Neal Sheinis
Hall Booth Smith PC
191 Peachtree Street NE, Suite 2900
Atlanta, GA 30303

FILED
2013 SEP 16 PM 3:11
CONNIE NEALE SHEINIS
CLERK OF COURT, C.P. & G.S.
FLORENCE COUNTY, S.C.

CURRENT STATUS: Active Member-Good Standing
DATE OF ADMISSION: 11/06/1995
BAR NUMBER: 639865
TODAY'S DATE: 08/08/2013

Listed below are the public disciplinary actions, if any, which have been taken against this member:

State Disciplinary Board Docket #	Supreme Court Docket #	Disposition	Date
N/A	N/A	N/A	N/A

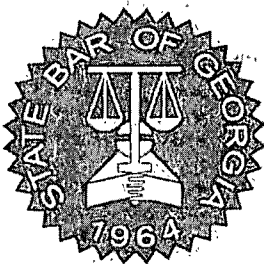
The prerequisites for practicing law in the State of Georgia are as follows:

- Certified by the Office of Bar Admissions, either by Exam, or on Motion (Reciprocity).
- Sworn in to the Superior Court in Georgia, highest court required to practice law in Georgia.
- Enrolled with the State Bar of Georgia, arm of the Supreme Court of Georgia.

Attorneys licensed in Georgia and whose membership is current are eligible to practice law in Superior Court. Attorneys may, upon application, apply for admission to the Supreme, District and State Court of Appeals.

Under the privacy/confidentiality provision of the Bar Rule 4-221(d), any complaint against a member resolved prior to the filing and docketing of a disciplinary case in the Supreme Court is not a matter of public record, and may not be revealed without a waiver from the member. It is the policy of the State Bar of Georgia to answer any inquiry about a member by disclosing only those complaints that have been docketed in the Supreme Court. With respect to matters that are currently pending as active, undocketed cases, when an inquiry is received, the State Bar of Georgia shall not disclose the existence of those complaints. Such non-disclosure should not be construed to confirm the existence of confidential complaints since the vast majority of members in good standing are not the subjects of such confidential complaints.

This member is currently in "good standing" as termed and defined by State Bar Rule 1-204. The member is current in license fees and is not suspended or disbarred as of the date of this letter.



STATE BAR OF GEORGIA

Paula O'Neil

Official Representative of the State Bar of Georgia

CERTIFIED: A TRUE COPY
Connie Neale Sheinis
CLERK OF COURT, C.P. & G.S.
FLORENCE COUNTY, S.C.

HEADQUARTERS
104 Marietta Street, Suite 100
Atlanta, Georgia 30303
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FAX (404) 527-8717
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SOUTH GEORGIA OFFICE
244 E. Second Street (Zip 31794)
P.O. Box 1390
Tifton, Georgia 31793-1390
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FAX (229) 382-7435

COASTAL GEORGIA OFFICE
18 E. Bay Street
Savannah, Georgia 31401-1225
(912) 239-9910 ■ (877) 239-9910
FAX (912) 239-9970

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

Angela Parsons

2012-CP-21-3016

Court of Common Pleas;
Twelfth Judicial Circuit

Plaintiff

Case No.

Court

vs.

Mailing Address of Court: 180 North Irby Street
Florence, SC 29501

Jane Smith, QHG of South Carolina d/b/a
Carolinas Hospital System, and Carolinas
Hospital System

Defendant:

2013 SEP 16 PM 3:11
 FILED
 CONNIE REE SHEPHERD
 CLERK OF COURT
 FLORENCE COUNTY, SC

Comes now Richard N. Sheinis, applicant herein, and respectfully represents the following:

1. Applicant resides at:

5179 Hidden Branches Circle

Street Address

Dunwoody

DeKalb

Georgia

30338

City

County

State

Zip Code

678-443-8523

Telephone

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

Smith, PC, with offices at, at

191 Peachtree Street, NE, Suite 2900

Street Address

Atlanta

Fulton

Georgia

30303

City

County

State

Zip Code

404-954-6966

Telephone

404-954-5020

Fax Number

3. Applicant has been retained personally or as a member of the above named law firm by Jane Smith, QHG of South Carolina d/b/a Carolinas Hospital System, and Carolinas Hospital System 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 November of 1995, 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 Georgia 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:
Georgia State Bar	November 1995
Tennessee State Bar	June 2006
North Carolina State Bar	February 2009
11th Circuit Court of Appeals	January 2009
United States District Court, Northern District of Georgia	November 1995
United States District Court, Middle District of Georgia	December 1995

CERTIFIED TRUE COPY
 Clerk of Court
 FLORENCE COUNTY, S.C.

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 Elizabeth Schwartz Corn, of the Hall Booth Smith, PC law firm, which has offices at:

40 Calhoun Street, Suite 550

Street Address

Charleston

Charleston

South Carolina

29401

County

City

State

Zip Code

843-720-3460

Telephone

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

Elizabeth Schwartz Corn

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).

Estate of Janie Young v. Gambro Health Care Charleston and DaVita, Inc. - Litigation was ended by defense verdict at trial. Order submitted on 8/2/07. Local counsel was James D. Myrick. Application granted.

Anthony B. Oxendine and Raquel M. Hunt, as Co-Administrators of the Estate of Kenyan Dale Bradley Oxendine; Michael F. McBryde and Deborah T. McBryde, as Co-Administrators of the Estate of Hannah Elisabeth McBryde; Michael F. McBryde and Deborah T. McBryde, as Co-Administrators of the Estate of Abigail Ruth McBryde and Michael F. McBryde, Individually and As Natural Guardian and Next Friend of Nathan McBryde - Litigation was ended by plaintiff verdict at trial. Local counsel was Jack G. Gresh. Application granted.

Tamara Bates Rhodes v. OHG of South Carolina, Inc. d/b/a Carolinas Hospital System and Melissa Demars and Nancy Buxton in their individual capacities - Litigation is ongoing. Local counsel is Elizabeth Schwartz Corn. Application granted.

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 6 day of ~~August~~ ^{September}, 2013.

Richard Sheinis
APPLICANT

VERIFICATION

STATE OF GA

COUNTY OF Fulton
Richard Sheinis

I, _____, 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.

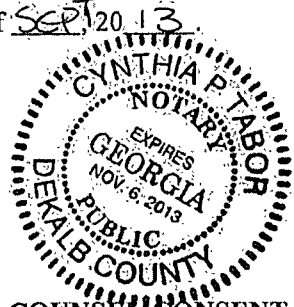
Richard Sheinis
APPLICANT/AFFIANT

Subscribed and sworn to before me this 6th day of Sept, 2013.

Cynthia P. Tabon

Notary Public for the State of GEORGIA

My Commission Expires: 11-6-2013



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 12th day of September, 2013.

[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 12th day of September, 2013.

Richard Sheinis
APPLICANT/AFFIANT

FILED
2013 SEP 16 PM 3:11
CONNIE REEL-SHEARER
C.C.P. & G.S.
FLORENCE COUNTY, SC

CERTIFIED: A TRUE COPY
Connie Reel Shearer
CLERK OF COURT C.P. & G.S.
FLORENCE COUNTY, S.C.

CLERK'S VERIFICATION

Collected by: AS Date Filed: _____
 MOTION FEE COLLECTED: \$ 25
 CONTESTED - AMOUNT DUE: \$ _____

SCCA 233 (11/2003)

Celeste Shumate Jones, Paralegal | 40 Calhoun Street, Suite 550
P: (843) 720-3497 | Charleston, SC 29401
E: csj@hallboothsmith.com | W: www.hallboothsmith.com
P: (843) 720-3460 F: (843) 720-3458

August 8, 2014

VIA FEDEX OVERNIGHT DELIVERY

The South Carolina Court of Appeals
Hon. V. Claire Allen, Deputy Clerk
1015 Sumter Street
Columbia, SC 29201

RE: Angela Parsons v. Jane Smith
Appellate Case No.: 2014-001636

Dear Ms. Allen,

With regards to the above referenced matter and your correspondence dated August 1, 2014, please find enclosed a copy of the Order appointing Richard N. Sheinis, Esq. to appear in the matter, Angela Parsons v. Jane Smith, QHG of South Carolina d/b/a Carolinas Hospital System, and Carolinas Hospital System, Florence County Case No.: 2012-CP-21-3016, *pro hac vice*, as well as all accompanying documentation, to include Elizabeth S. Corn, Esq.'s information (SC Bar Number 71120).

Should you have any questions or concerns, or need any additional information at the moment, please don't hesitate to contact our office.

Sincerely yours,



Celeste Shumate Jones
Paralegal to Elizabeth S. Corn, Esq.

CSJ

Enclosures as stated

cc: Pheobe Clark, Esq. (via email only)

RECEIVED

AUG 11 2014

SC Court of Appeals