

The Supreme Court of South Carolina

DANIEL E. SHEAROUSE
CLERK OF COURT

BRENDA F. SHEALY
CHIEF DEPUTY CLERK

POST OFFICE BOX 11330
COLUMBIA, SOUTH CAROLINA 29211
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FAX: (803) 734-0384

November 7, 2014

The Honorable Daniel E. Shearouse
Clerk of Court
South Carolina Supreme Court
Post Office Box 11330
Columbia, S.C. 29211

RE: George Skipper, et al v. ACE Property and Casualty
Insurance Company, et al
Case No.: 2014-001979
Appellate Case No.: 2013-000133

Dear Mr. Shearouse:

I certify that the Office of Bar Admissions has received verified applications requesting Robert Rivera, Jr., and Robert Safi be admitted *pro hac vice* in the above matter. The \$250 filing fee for each applicant has been paid.

Yours truly,

Deputy Clerk for Bar Admissions

GBW/st

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

George Skipper, Veronica Skipper, Michael Perry
Bowers, Specialty Logging, LLC, and Harold Moors,
Plaintiffs,

v.

ACE Property and Casualty Insurance Company,
Brantley C. Rowlen, and Erin Lawson Coia,
Defendants.

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NOV 06 2014

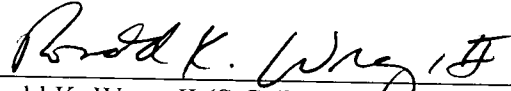
S.C. SUPREME COURT

APPELLATE CASE NO.: 2013-000133

**ACE PROPERTY AND CASUALTY INSURANCE COMPANY'S
MOTION FOR PRO HAC VICE ADMISSION
OF ROBERT SAFI**

Defendant ACE Property and Casualty Insurance Company, hereby moves this Honorable Court for an Order permitting the *Pro Hac Vice* admission of Robert Safi to appear before the Court in the above-captioned action as counsel for ACE Property and Casualty Insurance Company. In support of this motion, ACE would show that Robert Safi is a member in good standing of the bar of the highest court of the State of Texas, where he regularly practices law. His representation of ACE shall be in association with Ronald K. Wray, II, a member in good standing of the South Carolina Bar. Further, a verified application for admission *pro hac vice* of Robert Safi is being filed pursuant to Rule 404 of the South Carolina Appellate Court rules, which is attached is hereto as Exhibit "A". This motion is based upon Rule 404 of the South Carolina Rules of Appellate Procedure, the verified application for admission *Pro Hac Vice* of Robert Safi, and all applicable common and statutory law.

November 3, 2014



Ronald K. Wray, II (S.C. Bar #65046)
GALLIVAN, WHITE & BOYD, P.A.
55 Beattie Place; Suite 1200
Greenville, SC 29603
(864) 271-9580

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

George Skipper, Veronica Skipper,
Michael Perry Bowers, Specialty Logging,
LLC, and Harold Moors

2014-001979

The Supreme Court of South
Carolina

Plaintiff

Case No.

Court

vs.

Mailing Address of Court: 1231 Gervais Street
Columbia, SC 29201

ACE Property and Casualty Insurance
Company, Brantley C. Rowlen, and Eric
Lawson Coia

Defendant

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NOV 06 2014

Comes now Robert Safi, applicant herein, and respectfully represents the following:

S.C. SUPREME COURT

1. Applicant resides at:

Street Address

68 E. Broad Oaks Drive

Harris

Texas

77056

City

County

State

Zip Code

Houston

Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Susman
Godfrey, LLP, with offices at, at
1000 Louisiana St., Suite 5100

Street Address

Houston

Harris

Texas

77002

City

County

State

Zip Code

713-651-9366

Telephone

713-654-6666

Fax Number

3. Applicant has been retained personally or as a member of the above named law firm by Defendant ACE
Property and Casualty Insurance 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 4 of 2005, 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 Texas 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:

Texas State Bar - Number 24051280

11/04/2005

United States District Court, Southern District of Texas	02/02/2007
United States District Court, Northern District of Texas	03/01/2007
United States District Court, Eastern District of Texas	07/21/2014
United States Court of Appeals for the Fifth Circuit	01/27/2010
United States District Court, District of Colorado	10/07/2014

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.)

=

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):

=

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):

=

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):

=

9. Local counsel of record associated with applicant in this case is Ronald K. Wray, of the Gallivan, White & Boyd, P.A. law firm, which has offices at:

One Liberty Square, 55 Beattie Place, Suite 1200

Street Address

Greenville

Greenville

SC

29601

County

City

State

Zip Code

864-271-9580

Telephone

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

Robert River, Jr.

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).

George Skipper, et al. v. ACE Property and Casualty Insurance Company, et al., C.A. No. 1:14-cv-0444-JMC, PHV

submitted 2/24/2014, GRANTED, Local counsel is Ronald Wray Status is pending (Note: This is the case in

which the Hon. Michelle Childs certified the question to the SC Supreme Ct. that is the subject of this proceeding).

ACE Property and Casualty Insurance Company v. Specialty Logging LLC and Harold Moors, C:A: No. 1:14-cv-00944-

JMC, PHV submitted 4/18/2014, GRANTED, Local counsel is Ronald Wray Status is pending.

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 31st day of October, 2014.

RM
APPLICANT

VERIFICATION

STATE OF Texas)

COUNTY OF Harris)

I, Robert Safi, 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.

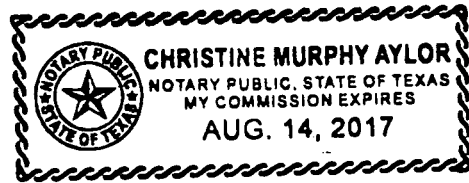
RM
APPLICANT/AFFIANT

Subscribed and sworn to before me this 31st day of Oct., 2014.

Christine Murphy Aylor

Notary Public for the State of Texas

My Commission Expires: Aug. 14, 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 3 day of Nov., 2014.

Ronald K. Wynn, II
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 31st day of October 2014.

RM
APPLICANT/AFFIANT

STATE BAR OF TEXAS



Office of The Chief Disciplinary Counsel

October 29, 2014

RE: **Mr. Robert Sabre Safi**
State Bar Number - **24051280**

To Whom it May Concern:

This is to certify that Mr. Robert Sabre Safi was licensed to practice law in Texas on November 04, 2005 and is an active member in good standing with the State Bar of Texas.

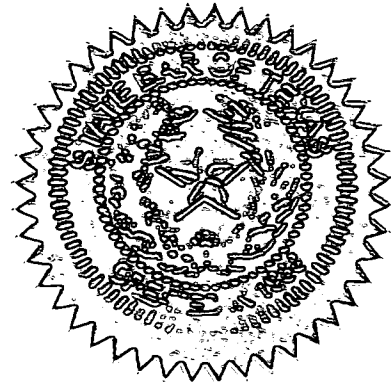
Good Standing means that the attorney is current on payment of Bar dues and attorney occupation tax; has met Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension.

This certification expires 30 days from this date, unless sooner revoked or rendered invalid by operation of rule or law.

A handwritten signature in black ink, appearing to read "L. Acevedo", written in a cursive style.

Linda A. Acevedo
Chief Disciplinary Counsel

LA/dh



THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

George Skipper, Veronica Skipper, Michael Perry
Bowers, Specialty Logging, LLC, and Harold Moors,
Plaintiffs,

v.

ACE Property and Casualty Insurance Company,
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APPELLATE CASE NO.: 2013-000133

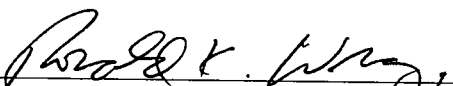
PROOF OF SERVICE

The undersigned, an attorney in this matter for the Defendant ACE Property and Casualty Insurance Company, certifies that I have this day of October, 2014, served copies of Defendant ACE Property and Casualty Insurance Company's Motion for *Pro Hac Vice* Admission of Robert Safi upon counsel for the Plaintiffs and counsel for Defendants Brantley C. Rowlen and Erin Lawson Coia by causing them to be deposited in the United States Mail, first-class postage prepaid, addressed to:

Mr. Mark B. Tinsley
Gooding and Gooding, PA
PO Box 1000
Allendale, SC 29810

Mr. Robert Hood, Jr.
Hood Law Firm
172 Meeting Street
Charleston, SC 29401

Mr. Randolph Murdaugh, IV
Peters, Murdaugh, Parker, Eltzroth &
Detrick, P.A.
PO Box 457
Hampton, SC 29924



Ronald K. Wray, II (S.C. Bar #65246)
GALLIVAN, WHITE & BOYD, P.A.
55 Beattie Place; Suite 1200
Greenville, SC 29603
(864) 271-9580

Attorneys for Defendant ACE