

# 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  
TELEPHONE: (803) 734-1080  
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.

APPELLATE CASE NO.: 2013-000133

**RECEIVED**

NOV 06 2014

**S.C. SUPREME COURT**

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

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Defendant ACE Property and Casualty Insurance Company, hereby moves this Honorable Court for an Order permitting the *Pro Hac Vice* admission of Robert Rivera 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 Rivera 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 Rivera 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 Rivera, and all applicable common and statutory law.

November 3, 2014

*Ronald K. Wray, II*

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Ronald K. Wray, II (S.C. Bar #65246)  
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

**RECEIVED**

NOV 06 2014

Comes now Robert Rivera, Jr., applicant herein, and respectfully represents the following:

**S.C. SUPREME COURT**

1. Applicant resides at:  
2215 Chilton St.  
Street Address  
Houston Harris Texas  
City County State  
713-653-7809  
Telephone

77019  
Zip Code

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 713-654-6666  
Telephone 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 of 1990, 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:

Court:	Date Admitted:
Southern District of Texas	1991
Eastern District of Texas	1999
Southern District of New York	2008
Northern District of Texas	2013

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 S. Safi

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: Pending (Note: This is case in which Hon. J. Michelle Childs certified the question to the SC Supreme Ct. that is 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: 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 31<sup>st</sup> day of October, 2014.

Robert Rivera, Jr.  
APPLICANT

**VERIFICATION**

STATE OF Texas)

COUNTY OF Harris)

I, Robert Rivera, Jr., 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.

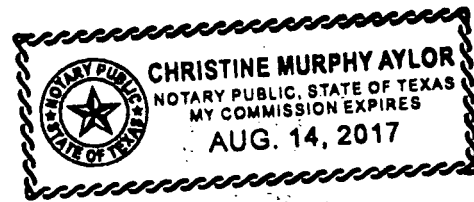
Robert Rivera, Jr.  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 31<sup>st</sup> 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.

Paul K. Wright  
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 31<sup>st</sup> day of October, 2014.

Robert Rivera, Jr.  
APPLICANT/AFFIANT

# STATE BAR OF TEXAS



Office of The Chief Disciplinary Counsel

October 29, 2014

RE: **Mr. Robert Rivera, Jr.**  
State Bar Number - **16958030**

To Whom it May Concern:

This is to certify that Mr. Robert Rivera, Jr. was licensed to practice law in Texas on November 02, 1990 and is an active member in good standing with the State Bar of Texas.

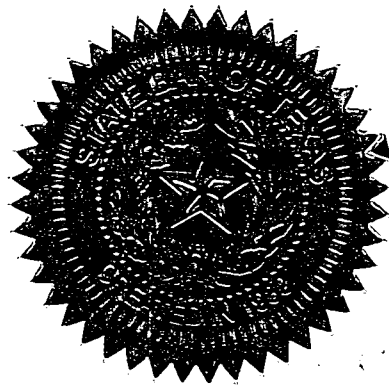
Good Standing means that the attorney is current on payment of Bar dues and attorney occupation tax; has met Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension.

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,

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ACE Property and Casualty Insurance Company,  
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Defendants.

APPELLATE CASE NO.: 2013-000133

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PROOF OF SERVICE

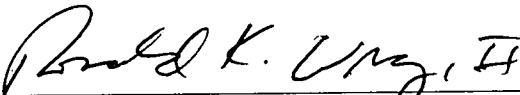
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The undersigned, an attorney in this matter for the Defendant ACE Property and Casualty Insurance Company, certifies that I have this day of October, 2014, served copies of Defendant ACE Property and Casualty Insurance Company's Motion for *Pro Hac Vice* Admission of Robert Rivera 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