

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

74715

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Joseph M. Strickland, Circuit Court Judge

Lower Case No. 2011-CP-40-07432
Appellate Case No. 2014-000398

William E. DeLoache, III
and Allison H. DeLoache. Appellants,

vs.

William Dixon Robertson, III; W. Jefferson Leath, Jr.;
Michael S. Seekings; LEATH, BOUCH & CRAWFORD, LLP;
Francis E. Grimball; MULLEN WYLIE, LLC formerly
MULLEN, WYLIE & SEEKINGS, LLC; William M. Bowen;
WILLIAM M. BOWEN, PA; and John D. Kassel Respondents.

**APPELLANTS' MOTION TO CERTIFY CASE
FOR REVIEW BY THE SUPREME COURT**

Thomas A. Pendarvis (SC Bar # 64918)
Catherine B. Kerney (SC Bar # 81429)
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Counsel for Appellants, William E. DeLoache, III
and Allison H. DeLoache

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SC Court of Appeals

MOTION

Pursuant to Rules 204(b) and 240, SCACR, Appellants, William E. DeLoache, III and Allison H. DeLoache, respectfully move to certify this case for review by the Supreme Court. The grounds for this motion are based on the fact that 1) the issues in this appeal are of significant public interest, 2) the legal principles are of major public importance, 3) there is no prior precedent by our Supreme Court on the specific issues in this appeal, and 4) the judicial economy in reassigning this matter to the Supreme Court.

The issues of significant public interest and legal principles of major public importance, include, among other things, the following:

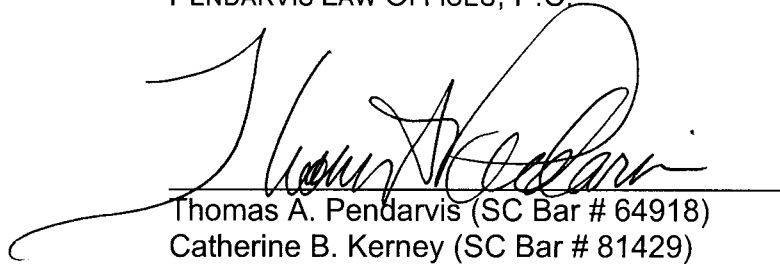
1. Whether lawyers have civil liability for the unauthorized use of South Carolinians' names as "clients," whom they delusively posited as objectors in a class action lawsuit, without consulting the individuals and without their knowledge, consent, or permission.
2. Whether lawyers have civil liability for the unauthorized appropriation of South Carolinians' names to obtain at least \$600,000 paid as "legal fees" when the individuals got no money and no other benefit whatsoever.
3. Whether lawyers have civil liability for revealing confidential information learned in the consultation with prospective clients to other lawyers looking for individuals to use as objectors in a class action lawsuit.

CONCLUSION

WHEREFORE, Appellants, William E. DeLoache, III and Allison H. DeLoache, respectfully request this Court or the South Carolina Supreme Court issue an Order reassigning this case to the South Carolina Supreme Court.

Respectfully submitted,

PENDARVIS LAW OFFICES, P.C.

A handwritten signature in black ink, appearing to read 'Thomas A. Pendarvis', is written over a horizontal line. The signature is fluid and cursive.

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Beaufort, South Carolina

January 6, 2015

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WILLIAM M. BOWEN, PA; and John D. Kassel Respondents.

PROOF OF SERVICE

I, Thomas A. Pendarvis, an attorney with PENDARVIS LAW OFFICES, P.C., certify that I have served one (1) copy of APPELLANTS' MOTION TO CERTIFY CASE FOR REVIEW BY SUPREME COURT on counsel for Respondents, by depositing a copy of the same in the United States Mail, postage prepaid, on the 6th day of January, 2015, addressed to:

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171 Church Street, Suite 370
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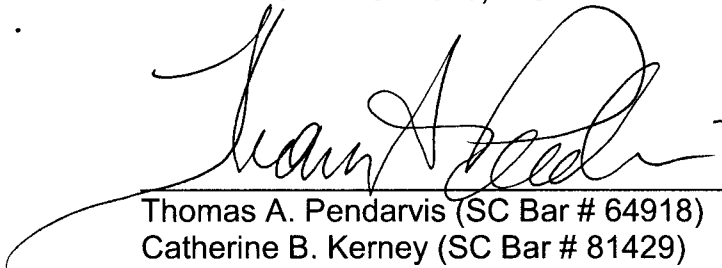
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Respectfully submitted,

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January 6, 2015

Beaufort, South Carolina

PENDARVIS LAW OFFICES, PC



January 6, 2015

Jenny Abbott Kitchings, Clerk of Court
COURT OF APPEALS FOR THE STATE OF SOUTH CAROLINA
PO Box 11629
Columbia, SC 29211

Re: DeLoache v Robertson, et al
Civil Action No. 2011-CP-40-7432
Appellate Case No. 2014-000398

Dear Ms. Kitchings:

Enclosed for filing please find the original and seven copies of APPELLANTS' MOTION TO CERTIFY CASE FOR REVIEW BY SUPREME COURT and PROOF OF SERVICE along with our check in the amount of \$25 to cover the filing fee.

Please return a clocked copy in the stamped, self-addressed return envelope enclosed for your convenience.

With kind regards, I remain

Sincerely,

PENDARVIS LAW OFFICES, P.C.

Thomas A. Pendarvis

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SC Court of Appeals

TAP/lat
Enclosures
cc w/encls:

Kent T. Stair, J.D.
Tyler P. Winton, J.D.
William P. Jones, J.D.
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Steven W. Ouzts, J.D.
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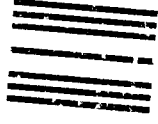
ec w/encls: William & Allison DeLoache

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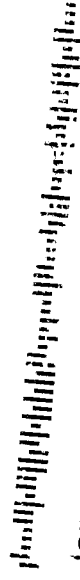
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