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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APR 15 2015

SC Court of Appeals

APPEAL FROM GEORGETOWN COUNTY  
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge

Appellate Case No. 2013-001644

John Steven Goodwin, et. al., ..... Respondents,

v.

Landquest Development, LLC, et. al. .... Appellants.

**NOTICE AND MOTION FOR ADMISSION OF KRISTEN G. ATKINS PRO HAC VICE**


YOU WILL PLEASE TAKE NOTICE, that counsel for the Defendant, Landquest Development, LLC, shall move before this Court on the tenth (10) day after service hereof, or as soon as the same may be heard, pursuant to the South Carolina Rules of Civil and Appellate Procedure for the Admission of Kristen G. Atkins *Pro Hac Vice* to represent the Defendant, Landquest Development, LLC, in the above-captioned matter. This motion will be based upon the attached Verified Application for Admission *Pro Hac Vice* of Kristen G. Atkins (attached hereto as **Exhibit A**), South Carolina case and statutory law, and the South Carolina Rules of Civil and Appellate Procedure.

**LOCAL COUNSEL CONSENT AND CONCLUSION**

I, Ronald L. Richter, Jr., do hereby consent, as local counsel of record, to the association of Kristen G. Atkins *Pro Hac Vice* to the South Carolina Bar. For the reasons stated on the Verified Application for Admission *Pro Hac Vice* of Kristen G. Atkins, it is respectfully requested that the Plaintiff's Motion for Admission *Pro Hac Vice* of Kristen G. Atkins be Granted.

Charleston, South Carolina  
April 13, 2015

**BLAND RICHTER, LLP**  
*Attorneys for Appellant*



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Ronald L. Richter, Jr.  
18 Broad Street, Mezzanine  
Charleston, South Carolina 29401  
843.573.9900

**THE STATE OF SOUTH CAROLINA**  
**In the Court of Appeals**

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***EXHIBIT A***

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

John Steven Goodwin, et. al.

2009-CP-22-1045/2013-1664

South Carolina Court of  
Appeals

Plaintiff

Case No.

Court

vs.

Mailing Address of Court: Post Office Box 11629  
Columbia South Carolina 29211

Landquest Development, LLC, et. al.  
Defendant

Comes now Kristen G. Atkins, applicant herein, and respectfully represents the following:

1. Applicant resides at:

725 Pine Forest Drive South

Street Address

Siler City

US

NC

27344

City

County

State

Zip Code

919-776-6337

Telephone

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

Akins/Hunt/Atkins, PC, with offices at, at

134 North Main Street Suite 204

Street Address

Fuquay Varina

US

NC

27526

City

County

State

Zip Code

919-552-2020

Telephone

919-552-3221

Fax Number

3. Applicant has been retained personally or as a member of the above named law firm by Landquest Development, LLC 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 August of 2007, 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 North Carolina 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:
North Carolina State Court	2007
North Carolina Federal Court Eastern District	2008
North Carolina Federal Court Western District	2014
Virginia Federal Court Western District	2011 (pro hac vice)
South Carolina State Court	2012 (pro hac vice)

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.)

N/A

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):

N/A

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):

N/A

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):

N/A

9. Local counsel of record associated with applicant in this case is Ronald Richter, Jr., of the Bland Richter, LLP law firm, which has offices at:

People's Building,

Street Address

Charleston

Charleston

SC

29401

County

City

State

Zip Code

843-573-9900

Telephone

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

N/A

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).

2:09-cv-01018-PMD Christopher Staubes

2010-CP-22-1377 Christopher Staubes

2010-CP-22-01268 Christopher Staubes

2012-CP-22-0934 Ronald Richter, Jr.

2008-CP-22-1490 Ronald Richter, Jr.

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 13 day of April, 2015.

[Signature]  
APPLICANT  
**VERIFICATION**

STATE OF NC  
COUNTY OF Wake

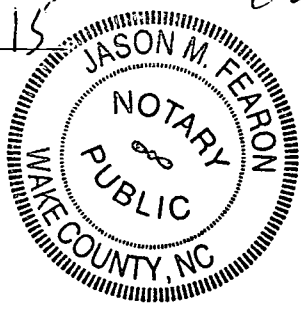
I, ~~Kristen Atkins~~ <sup>Atkins</sup>, do hereby swear or affirm under penalty of perjury that I am the applicant in the above styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true.

[Signature]  
APPLICANT/AFFLIANT

Subscribed and sworn to before me this 24 day of May, 20 15

[Signature]  
Notary Public for the State of NC

My Commission Expires: 4/2/2018



**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 13 day of April, 20 15.

[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 13 day of April, 20 15.

[Signature]  
APPLICANT/AFFLIANT

# The North Carolina State Bar

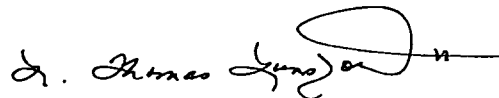
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I, L. Thomas Lunsford, II, Secretary of the North Carolina State Bar, do hereby certify that Ms. Kristen G. Atkins (36601) was licensed to practice law by the State of North Carolina on August 24, 2007. Said lawyer is presently an active member of the North Carolina State Bar and is eligible to practice law in North Carolina. Said lawyer is not subject to a pending order of administrative or disciplinary suspension. Said lawyer's financial account with the State Bar is current. Therefore, said lawyer is in good standing with the North Carolina State Bar.

This certificate is issued without regard to prior discipline, or any unresolved disciplinary charges or grievances.

Given over my hand and the Seal of the North Carolina State Bar, this

9<sup>th</sup> day of March, 2015.



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Secretary of the North Carolina State Bar

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***PROOF OF SERVICE***

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I, Lisa M. Lescord, the undersigned paralegal to Ronald L. Richter, Jr., attorney for the Plaintiffs, do hereby certify that I have served upon the Defendants in the above referenced matter, by forwarding a copy of the same, via email and/or first class mail postage prepaid, unless otherwise stated below, to the following counsel listed below:

Documents:

**NOTICE OF MOTION AND MOTION FOR THE ADMISSION OF KRISTEN G. ATKINS *PRO HAC VICE***

Counsel:

Elise Freeman Crosby, Esquire  
405 Dozier Street  
Georgetown, SC 29440

Joseph Qualey, Esquire  
23 Broad Street  
Charleston, SC 29401

Lawrence Michael Hershon, Esquire  
James Lynn Werner, Esquire  
PO Box 1509  
Columbia, SC 29202

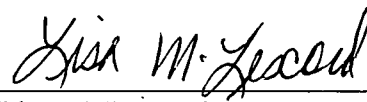
John M. Leiter, Esquire  
1203 48<sup>th</sup> Ave. North, Suite 109  
Myrtle Beach, SC 29577

Andrew F. Lindemann, Esquire  
PO Box 8568  
Columbia, SC 29202

Charles T. Smith, Esquire  
608 Cypress Street  
Georgetown, SC 29440

Douglas K. Thornton, Esquire  
1025 Third Ave.  
Conway, SC 29526

April 13, 2015



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Lisa M. Lescord  
Paralegal to Ronald L. Richter, Jr.

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**ORDER OF ADMISSION PRO HAC VICE**

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Upon consideration of the motion submitted by local counsel, Ronald L. Richter, Jr., to admit Kristen G. Atkins *Pro Hac Vice* to represent Defendant, Landquest Development, LLC in the within action, it is hereby

**ORDERED**, that the said motion be **GRANTED** and the applicant, Kristen G. Atkins may appear on behalf of the represented party in accordance with the South Carolina Rules of Civil and Appellate Procedure.

**IT IS SO ORDERED.**

This the \_\_ day of \_\_\_\_\_, 2015.

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Eric S. Bland\*

Ronald L. Richter, Jr.

\*Also admitted in PA & FL

South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

**RE: Goodwin, et al. v. Landquest Development, LLC, et al.  
Appellate Case No. 2013-001644**

Dear Clerk:

Enclosed for the review and signature and for filing you will find an original and two (2) copies of my Notice, Motion, Verified Application and Proposed Order for the Admission of Kristen G. Atkins, Esquire *Pro Hac Vice* in connection with the above-referenced matter. I have also enclosed a check in the amount of \$25.00 as payment for the fees associated with the filing of the Order.

Please forward to the Judge for review and, if it is met with approval, signature. Once the signed original has been returned to you, please file the original, clock the copy and return the clocked copy to me.

By copy of this letter to opposing counsel, I am hereby serving the same upon them this date under separate cover.

Thanking you for your assistance with this matter, I am

Very truly yours,

  
Ronald L. Richter, Jr.

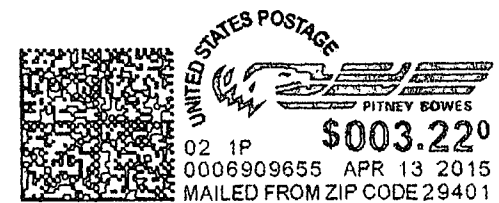
RJR/lml  
Enclosures

cc: (via Regular US Mail)  
Elise Freeman Crosby, Esquire  
Lawrence Michael Hershon, Esquire  
James Lynn Werner, Esquire  
John M. Leiter, Esquire  
Andrew F. Lindemann, Esquire  
Joseph Qualey, Esquire  
Charles T. Smith, Esquire  
Douglas K. Thornton, Esquire

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Reply to:  
Peoples Building  
Mezzanine Level  
18 Broad Street  
Charleston, SC 29401  
Phone: 843.573.9900  
Fax: 843.573.0200  
ronnie@blandrichter.com

Offices also at:  
1500 Calhoun Street  
Columbia, SC 29201  
Mail: P.O. Box 72  
Columbia, SC 29202  
Phone: 803.256.9664  
Fax: 803.256.3056  
ericbland@blandrichter.com



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