

2015 MAR 24 PM 2 16

STATE OF SOUTH CAROLINA
COUNTY OF PICKENS
CLERK OF COURT IN THE COURT OF COMMON PLEAS
PICKENS COUNTY
SOUTH CAROLINA
CASE NO. 2006-CP-39-1826

J. Scott Kunst,)
)
Plaintiff,)
)
v.)
)
David Loree,)
)
Defendant.)
)
)
)

ORDER TO ADMIT COUNSEL
PRO HAC VICE

RECEIVED

JUL 24 2015

SC Court of Appeals

THIS ORDER is pursuant to a Motion filed by local counsel V. Elizabeth Wright, for Defendant David Loree to have Gregory K. Smith of the Georgia Bar admitted *pro hac vice*.

All conditions of Rule 404, SCCR, have been met and satisfied.

THEREFORE IT IS ORDERED as follows:

1. That Gregory K. Smith be admitted *pro hac vice* to the Bar of this Court, for the purposes of the above-captioned matter;
2. That, along with local counsel V. Elizabeth Wright, Mr. Smith be entitled to represent David Loree in all motions, trial proceedings, hearings, trials and any other proceedings in this Court. Mr. Smith has also consented to and is required to abide by the ethical standards governing the practice of law in this Court pursuant to Rule 404(e), SCACR.

IT IS SO ORDERED.

Letitia Verdin
Presiding Judge, Thirteenth Judicial Circuit

#2162

Greenville, South Carolina

Mar. 24, 2015

Certified Copy

Harold P. Vetter

Clerk of Court
Pickens County, SC

Dated Mar. 2015

MB

COVINGTON, PATRICK, HAGINS, STERN & LEWIS, LLC

An Association of Independent Attorney Professional Associations

T. S. Stern, Jr.
Direct Dial: (864) 240-5516
Direct Fax: (864) 240-5545
E-Mail: sstern@covpatlaw.com

CLERK OF COURT
PICKENS COUNTY
SOUTH CAROLINA

2015 MAR 18 P 3:59

864.242.9000
864.233.9777 Fax
1.800.849.2988

V. Elizabeth Wright
Associate
Direct Dial: (864) 240-5519
E-Mail: bwright@covpatlaw.com

Writer's Direct E-Mail: bwright@covpatlaw.com
Direct Dial: (864) 240-5519

March 16, 2015

The Honorable Pat Welborn
Clerk of Court for Pickens County
214 E. Main Street
Pickens, SC 29671

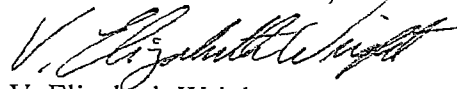
RE: Kunst v. Loree
2006-CP-39-1826

Dear Mr. Welborn:

Please find enclosed for filing the original and two copies of the Motion for Admission *Pro Hac Vice*. By copy of this correspondence I am serving the *pro se* Plaintiff by U.S. first class mail.

Very truly yours,

COVINGTON, PATRICK, HAGINS,
STERN & LEWIS, LLC


V. Elizabeth Wright

BW
Enclosures

cc. J. Scott Kunst, *pro se*

STATE OF SOUTH CAROLINA)
 COUNTY OF PICKENS)
 CLERK OF COURT)
 PICKENS COUNTY)
 SOUTH CAROLINA)

IN THE COURT OF COMMON PLEAS
 THIRTEENTH JUDICIAL CIRCUIT

2015 MAR 18 P 3:59

CASE NO.: 2006-CP-39-1826

J. Scott Kunst, *pro se*)
)
 Plaintiff,)
 vs.)
)
 David Loree)
)
 Defendant.)

**MOTION AND ORDER INFORMATION
 FORM AND COVERSHEET**

| | |
|--|---|
| Plaintiff's Attorney: J. Scott Kunst, <i>pro se</i> Address: 130 Arabian Way Simpsonville, SC 29681 Phone: Fax E-mail: Other: | Defendant's Attorney: V. Elizabeth Wright, Bar No. 76029 Covington, Patrick, Hagins, Stern & Lewis, P.A. Address: P.O. Box 2343, Greenville, SC 29602 Phone: 864.242.9000 Fax 864.233.9777 E-mail: bwright@covpatlaw.com Other: |
|--|---|

- MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)
 FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)
 PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)

SECTION I: Hearing Information
 Nature of Motion: *Pro Hac Vice*
 Estimated Time Needed: _____ Court Reporter Needed: YES / NO

SECTION II: Motion/Order Type
 Written motion attached
 Form Motion/Order
 I hereby move for relief or action by the court as set forth in the attached proposed order.
V. Elizabeth Wright
 Signature of Attorney for Plaintiff / Defendant Date submitted *3-16-15*

SECTION III: Motion Fee
 PAID - AMOUNT: \$ 25.00
 EXEMPT: (check reason)

| |
|--|
| <input type="checkbox"/> Rule to Show Cause in Child or Spousal Support |
| <input type="checkbox"/> Domestic Abuse or Abuse and Neglect |
| <input type="checkbox"/> Indigent Status <input type="checkbox"/> State Agency v. Indigent Party |
| <input type="checkbox"/> Sexually Violent Predator Act <input type="checkbox"/> Post-Conviction Relief |
| <input type="checkbox"/> Motion for Stay in Bankruptcy |
| <input type="checkbox"/> Motion for Publication <input type="checkbox"/> Motion for Execution (Rule 69, SCRPC) |
| <input type="checkbox"/> Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions |
| Name of Court Reporter: _____ |
| <input type="checkbox"/> Other: _____ |

JUDGE'S SECTION
 Motion Fee to be paid upon filing of the attached order.
 Other: _____

JUDGE CODE _____
 Date: _____

Ronnie Fox
 Collected by: _____ Date Filed: _____
 MOTION FEE COLLECTED: \$ 25.00
 CONTESTED - AMOUNT DUE: \$ _____

CLERK'S VERIFICATION

MOTION FEE PAID

STATE OF SOUTH CAROLINA
COUNTY OF PICKENS

CLERK OF COURT
PICKENS COUNTY
SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

2015 MAR 18 P 3:59
CASE NO. 2006-CP-39-1826

J. Scott Kunst,)
)
Plaintiff,)
)
v.)
)
David Loree,)
)
Defendant.)
)
)

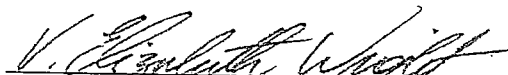
**MOTION FOR ADMISSION
PRO HAC VICE**

Pursuant to Rule 404, SCACR, Gregory K. Smith, Esquire of the firm of King & Spaulding, L.L.P. in Atlanta, Georgia moves to appear *pro hac vice* as counsel for Defendant David Loree, along with local counsel V. Elizabeth Wright (S.C. Bar ID 76029), whose address and telephone number are listed below.

Mr. Smith is a member in good standing of the highest court of the State of Georgia. Mr. Smith agrees to abide by the ethical standards governing the practice of law in the State of South Carolina, pursuant to Rule 404, SCACR.

Mr. Smith's Verified Application for Admission *Pro Hac Vice* is attached as Ex. A. This application includes Mr. Smith's Affidavit and a Certificate of Good Standing from the Supreme Court of Georgia. Ex. B is the March 3, 2015 Verification of Application and Payment of Filing Fee from the South Carolina Supreme Court. Ex. C is a proposed order.

COVINGTON, PATRICK, HAGINS,
STERN & LEWIS, LLC



T.S. Stern, Jr. (S.C. Bar #5337)
E-Mail: sstern@covpatlaw.com
V. Elizabeth Wright (S.C. Bar #76029)
E-Mail: bwright@covpatlaw.com

211 Pettigru Street
P.O. Box 2343 (29602)
Greenville, SC 29601
864.242.9000

Greenville, South Carolina
March 16, 2015

Ex. A

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

J. Scott Kunst

2006-CP-39-1826

COUNTY OF PICKENS
COURT OF COMMON PLEAS

Plaintiff

Case No.

Court

vs.

Mailing Address of Court: 214 E. Main Street
Pickens, SC 29671

David Loree

Defendant

Comes now Gregory Keith Smith, applicant herein, and respectfully represents the following:

1. Applicant resides at:

804 Sylvania Court

Street Address

Mableton

Cobb

Georgia

30126

City

County

State

Zip Code

404-308-1589

Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) King & Spalding LLP, with offices at, at

180 Peachtree Street

Street Address

Atlanta

Fulton

Georgia

30309

City

County

State

Zip Code

404-572-4600

Telephone

404-572-5138

Fax Number

3. Applicant has been retained personally or as a member of the above named law firm by Defendant David Loree 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 28 April of 2002, 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 Court of Appeals | April 29, 2002 | RECEIVED |
| United States District Court for the Northern District of Georgia | April 29, 2002 | |
| United States District Court for the Middle District of Georgia | November 29, 2007 | |
| United States Court of Appeals for the Eleventh Circuit | May 17, 2004 | |
| | | FEB 24 2015 |
| | | S.C. SUPREME COURT |

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 V. Elizabeth Wright, of the Covington, Patrick, Hagins, Stern & Lewis, LLC law firm, which has offices at:

211 Pettigru Street

Street Address

Greenville

County

864-242-9000

Telephone

Greenville

City

South Carolina

State

29601

Zip Code

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).

N/A

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 9th day of February, 2015.

STATE OF GEORGIA) AFFIDAVIT
)
COUNTY OF FULTON)

PERSONALLY APPEARED BEFORE ME Gregory Keith Smith, a member of the Bar of the State of Georgia, who deposes as follows:

1. I am an attorney licensed to practice law in the State of Georgia;
2. I seek to be allowed to appear *pro hac vice* in the Court of Common Pleas, Pickens County, State of South Carolina in the action *Kunst v. Loree*, civil action number 2006-CP-39-1826;
3. I am not a member of the South Carolina Bar;
4. I am not regularly employed to practice law in the State of South Carolina;
5. I am not regularly engaged in professional practices in the State of South Carolina.

FURTHER AFFIANT SAYETH NAUGHT.



Gregory K. Smith

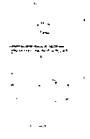
SWORN TO BEFORE ME

This 9th day of February, 2015

Kathie N. Daniel
Notary Public for the State of Georgia

My Commission Expires: Feb 5, 2015

WETA COUNTY



Supreme Court
State of Georgia
STATE JUDICIAL BUILDING
Atlanta 30334

HUGH P. THOMPSON, CHIEF JUSTICE
P. HARRIS HINES, PRESIDING JUSTICE
ROBERT BENHAM
CAROL W. HUNSTEIN
HAROLD D. MELTON
DAVID E. NAHMIA
KEITH R. BLACKWELL
JUSTICES

THÉRÈSE S. BARNES, CLERK
JEAN RUSKELL, REPORTER

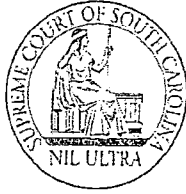
February 5, 2015

I hereby certify that Gregory Keith Smith, Esq., was admitted on the 29th day of April, 2002, as a member of the bar of the Supreme Court of Georgia, the highest court of this State; and, since that date he has been and is now a member of this bar in good standing, as appears from the records and files in this office.

Witness my signature and the seal of this Court
hereto affixed the day and year first above written.

Therese S Barnes, Clerk

Ex. B



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) 734-0394

March 3, 2015

Clerk of Court
Pickens County
P.O. Box 215
Pickens 29671

RE: J. Scott Kunst v. David Loree
Civil Action No. 2006-CP-39-1826

Dear Clerk of Court:

I certify that the Office of Bar Admissions has received a verified application requesting Gregory Keith Smith be admitted *pro hac vice* in the above action. The \$250 filing fee for the applicant has been paid.

Yours truly,

Deputy Clerk for Bar Admissions

GBW/st

STATE OF SOUTH CAROLINA
COUNTY OF PICKENS

CLERK OF COURT
PICKENS COUNTY
SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

CASE NO. 2006-CP-39-1826

J. Scott Kunst,

2015 MAR 18 P 4:00

Plaintiff(s),

CERTIFICATE OF SERVICE

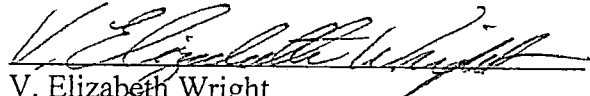
v.

David Loree,

Defendant(s).

I, V. Elizabeth Wright, an attorney with the law firm of Covington, Patrick, Hagins, Stern & Lewis, LLC, do hereby certify that on the 16th day of March, 2015, I deposited into the U.S Mail, First-Class postage prepaid, the Motion for Admission *Pro Hac Vice* to the *pro se* litigant at the address listed below.

J. Scott Kunst
130 Arabian Way
Simpsonville, SC 29681


V. Elizabeth Wright

Greenville, South Carolina
March 16, 2015

2015 MAR 18 P 4:00