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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

SEP 23 2015

SC Court of Appeals

The Honorable Letitia H. Verdin, Circuit Court Judge

Case No. 2010-CP-23-5880
Appellate Case No.: 2015-000523

Overland, Inc., d/b/a Land Rover Greenville,..... Appellant,

vs.

Lara Marie Nance, Charlie Andrew Nance, Roger Fields,
Synovus Financial Corporation d/b/a NBSC, Branch Banking
and Trust Company, Bank of America Corporation,
and SunTrust Banks, Inc. Defendants,

Of whom Lara Marie Nance, Charlie Andrew Nance, Roger Fields, Bank of America
Corporation, and SunTrust Banks, Inc. are the Respondents.

MOTION FOR ADMISSION *PRO HAC VICE* OF JAN T. CHILTON

Pursuant to Rule 404, SCACR, respondent Bank of America, N.A. (B of A) hereby
submits the within motion for admission *pro hac vice* for Jan T. Chilton (Motion). Bank of
America, N.A., was substituted for Bank of America Corporation by consent order.

The undersigned counsel is an attorney in good standing admitted to practice before the
state courts of South Carolina, including the Court of Appeals, and is a member of the South
Carolina Bar.

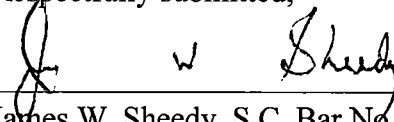
Jan T. Chilton is an attorney and member of the law firm of Severson & Werson, P.C. in San Francisco, California. Since January of 1971, he has been admitted to practice before the bar of the highest court of the State of California where he regularly practices law. A copy of the Verified Application for Admission *Pro Hac Vice* is attached hereto.

As set forth in the Application and as required by Rule 404(d)(9), SCACR, Jan T. Chilton has agreed to comply with the applicable statutes, law and procedural rules of the State of South Carolina; to be familiar with and comply with the South Carolina Rules of Professional Conduct; and to submit to the jurisdiction of the South Carolina courts and the South Carolina disciplinary process.

WHEREFORE, B of A respectfully requests the Court enter an order allowing Jan T. Chilton to appear before the Court in the above-captioned matter as attorney for B of A.

Date: 9/21/15

Respectfully submitted,



James W. Sheedy, S.C. Bar No. 5052
Susan E. Driscoll, S.C. Bar No. 71447
Driscoll Sheedy, P.A.
11520 N. Community House Road
Suite 200
Charlotte, N.C. 28277
(704) 341-2101 - Telephone
(704) 341-2015 - Facsimile
jimsheedy@driscollsheedy.com
sdriscoll@driscollsheedy.com

Attorneys for Respondent Bank of America

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

Overland, Inc., d/b/a Land Rover
Greenville

2015-000523

Court of Appeals

Plaintiff

Case No.

Court

vs.

Mailing Address of Court: P.O. Box 11629
Columbia, S.C. 29211

Lara Marie Nance, et al.

Defendant

Comes now Jan T. Chilton, applicant herein, and respectfully represents the following:

FILED-CLERK OF COURT
 GREENVILLE CO. S.C.
 PAUL B. WICKENSIMMER
 2015 SEP 16 PM 2 35

1. Applicant resides at:

2396 Mar East St.

Street Address

Tiburon

Marin

California

94920

City

County

State

Zip Code

415.435.3620

Telephone

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

One Embaradero Center, 26th Floor

Street Address

San Francisco

San Francisco

California

94111

City

County

State

Zip Code

(415) 398-3344

Telephone

(415) 956-0439

Fax Number

3. Applicant has been retained personally or as a member of the above named law firm by Bank of America 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 January of 1971, 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 California 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:

Ninth Circuit & California federal district courts	1971
Tenth Circuit	1980
United States Supreme Court	1980
Fifth Circuit	1995

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S.C. SUPREME COURT

Seventh Circuit	1998
State of Tennessee	2000
see attached sheet	

Attachment 5: Additional admissions to practice:

Court:	Date admitted:
Third Circuit	2001
Eleventh Circuit	2001
Eighth Circuit	2013
Sixth Circuit	2104

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.)

None

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):

None

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):

None

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):

None

9. Local counsel of record associated with applicant in this case is James W. Sheedy, of the Driscoll Sheedy, P.A. law firm, which has offices at:

331 East Main Street, Suite 235

Street Address

York

Rock Hill

S.C.

29730

County

City

State

Zip Code

(803) 327-4472

Telephone

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

Susan Driscoll, of Driscoll Sheedy, P.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).

None

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 July, 2015.

Jan T. Chilton

APPLICANT

VERIFICATION

STATE OF California)

COUNTY OF San Francisco)

I, Jan T. Chilton, 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.

Jan T. Chilton
APPLICANT/AFFIANT

Subscribed and sworn to before me this 31st day of July, 2015.

Marilyn Li

Notary Public for the State of CALIFORNIA

My Commission Expires: 10/21/15



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 11 day of Aug, 2015.

J. W. Shuey
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 19TH day of August 2015.

Jan T. Chilton
APPLICANT/AFFIANT



THE STATE BAR OF CALIFORNIA

MEMBER RECORDS & COMPLIANCE

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

CERTIFICATE OF STANDING

July 28, 2015

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, JAN TIMOTHY CHILTON, #047582 was admitted to the practice of law in this state by the Supreme Court of California on January 7, 1971; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Louise Turner
Custodian of Membership Records

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM GREENVILLE COUNTY
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Case No. 2010-CP-23-5880
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Overland, Inc., d/b/a Land Rover Greenville, Appellant,

vs.

Lara Marie Nance, Charlie Andrew Nance, Roger Fields,
Synovus Financial Corporation d/b/a NBSC, Branch Banking
and Trust Company, Bank of America Corporation,
and SunTrust Banks, Inc. Defendants,

Of whom Lara Marie Nance, Charlie Andrew Nance, Roger Fields, Bank of America
Corporation, and SunTrust Banks, Inc. are the Respondents.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the date indicated below he served the
Motion for Admission Pro Hac Vice of Jan T. Chilton on the following by sending copies
of the same via first class U.S. mail on the date set forth below.

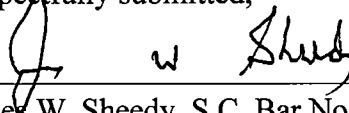
T. Hunter Reid, Esq.
James W. Fayssoux, Jr., Esq.
Fayssoux Law Firm, P.A.
209 East Washington Street
Greenville, S.C. 29601

W. Howard Boyd, Jr., Esq.
Gallivan, White & Boyd, P.A.
55 Beattie Place, Suite 1200
Greenville, S.C. 29601

Carl F. Muller, Esq.
Carl F. Muller Attorney at Law, P.A.
607 Pendleton Street, Suite 201
Greenville, S.C. 29601

Date: 9/21/15

Respectfully submitted,



James W. Sheedy, S.C. Bar No. 5052
Susan E. Driscoll, S.C. Bar No. 71447
Driscoll Sheedy, P.A.
11520 N. Community House Road
Suite 200
Charlotte, N.C. 28277
(704) 341-2101 - Telephone
(704) 341-2015 - Facsimile
jimsheedy@driscollsheedy.com
sdriscoll@driscollsheedy.com

Attorneys for Respondent Bank of America

Driscoll SHEEDY

A PROFESSIONAL ASSOCIATION | ATTORNEYS AT LAW

James W. Sheedy
Lic. in NC & SC
Direct: 704 341 2102
Fax: 704 341 2105
jimsheedy@driscollsheedy.com

Ballantyne: 11520 N. Community House Road
Suite 200 | Charlotte, NC 28277
South Carolina Office: 331 E. Main Street
Fountain Park Business Center
Suite 235 | Rock Hill, SC 29730
PO Box 4589 | Rock Hill, SC 29732
www.driscollsheedy.com

September 21, 2015

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SEP 23 2015

SC Court of Appeals

Via Federal Express
Honorable Jenny Abbot Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, S.C. 29201

Re: Overland, Inc., d/b/a Land Rover Greenville v. Lara Marie Nance, et al.
C.A. No.: 2010-CP-23-5880
Appellate Case No.: 2015-000523

Dear Ms. Kitchings:


Enclosed please find the original and seven (7) copies of the Motion for Admission *Pro Hac Vice* of Jan T. Chilton (with corresponding copies of the Verified Application for Admission *Pro Hac Vice*) and a Certificate of Service in the above captioned matter. Please return filed copies to me in the enclosed envelope. I have also enclosed a check in the amount of \$25.00 for the motion filing fee.

By copy of this letter, I have served copies of these documents on counsel of record.

With kindest regards, I remain

Respectfully,

DRISCOLL SHEEDY, P.A.


James W. Sheedy

September 21, 2015

Page 2

cc: Jan T. Chilton, Esq.
James W. Fayssoux, Jr., Esq.
T. Hunter Reid, Esq.
W. Howard Boyd, Jr., Esq.
Carl F. Muller, Esq.

ORIGIN ID: MEOA (704) 341-2101
JAMES W. SHEEDY
DRISCOLL SHEEDY, P.A.
11520 NORTH COMMUNITY HOUSE ROAD
SUITE 200
CHARLOTTE, NC 28277
UNITED STATES US

SHIP DATE: 21SEP15
ACTWGT: 1.00 LB
CAD: 100011762/INET3670

BILL SENDER

TO HONORABLE JENNY ABBOT KITCHINGS
SC CLERK OF COURT OF APPEALS
1220 SENATE STREET

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SEP 23 2015

COLUMBIA SC 29201

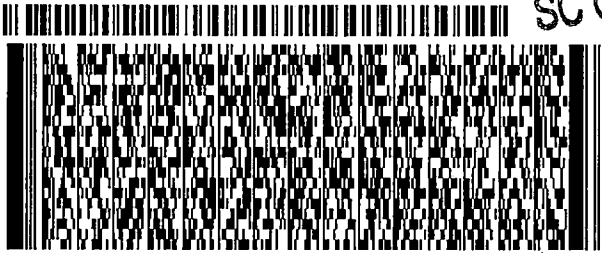
(704) 341-2101

REF: OVERLAND

INV.
PO:

DEPT:

SC Court of Appeals



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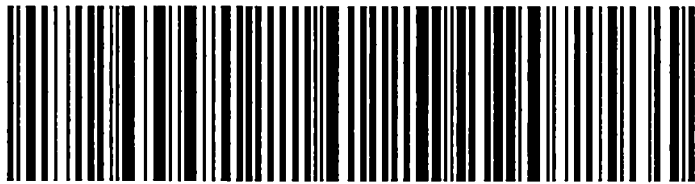
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CAE



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