

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Richland County
In the Court of Common Pleas

G. Thomas Cooper, Jr., Circuit Court Judge

Appellate Case No. 2015-000218

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S.C. SUPREME COURT

CACH, L.L.C.....Respondent,

v.

Toby Hoffman, Jr., a/k/a
Carl W. Hoffman, Jr.....Appellant.

**MOTION TO ADMIT ASSOCIATE COUNSEL
PRO HAC VICE**

The appellant moves this court for an order admitting Peter A. Holland, Esquire, of Holland Law firm P.C., Annapolis, Maryland, as associate counsel in this appeal, pursuant to Rule 404 of the South Carolina Appellate Court Rules.

The applicant, Mr. Holland, contemporaneous with the filing of this motion, has submitted his application to appear pro hac vice. A copy of the application is attached.

This appeal is before this Supreme Court on a petition for certiorari to the Court of Appeals, and involves a novel and important question of law regarding the character and quantum of evidence required in an action to collect a debt, purchased by a corporate buyer of debt. Mr. Holland is nationally renowned and has expertise in this area.

It is the intention and the desire of the undersigned as counsel for the appellant to associate Mr. Holland for the argument of this appeal. The undersigned understands and agrees that he will nevertheless be responsible for the ultimate resolution of this case, including the preparation of pleadings and papers, argument and further appearances.

Counsel therefore respectfully requests that Mr. Holland be admitted pro hac vice in this appeal, in association with the undersigned attorney of record.


JOHN D. ELLIOTT
Attorney for Appellant
P.O. Box 607
1122 Lady Street – Suite 710
Columbia, SC 29202
Phone 803.252.9236
E-Mail: jayel@mindspring.com

Columbia, South Carolina

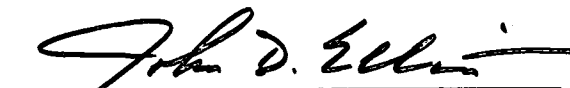
October 30th, 2015

CERTIFICATE OF SERVICE

Counsel certifies he has served the motion to admit counsel pro hac vice on all parties by depositing a copy of the same in the United States Mail, postage prepaid, on this 30th day of October, 2015:

Edward H. Overcash, Jr., Esquire
Law Offices of Ed Overcash, L.L.C.
37 Villa Road, Suite 507
Greenville SC 29615

Manuel H. Newburger, Esquire
Barron & Newburger P.C.
1212 Guadalupe, Suite 104
Austin TX 78701


JOHN D. ELLIOTT
Attorney for the Appellant

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

CACH, LLC

2015-000218

The Supreme Court of South
Carolina

Plaintiff

Case No.

Court

vs.

Mailing Address of Court: Supreme Court of South Carolina
P.O. Box 11330
Columbia, SC 29211

TOBY HOFFMAN, JR., a/k/a Carl W.
Hoffman, Jr.

Defendant

Comes now Peter A. Holland, applicant herein, and respectfully represents the following:

1. Applicant resides at:

3209 Chrisland Drive

Street Address

Annapolis

Anne Arundel

Maryland

21403

City

County

State

Zip Code

410-280-6133

Telephone

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

Holland Law Firm, P.C., with offices at, at

1910 Towne Centre Blvd., Ste. 250

Street Address

Annapolis

Anne Arundel

Maryland

21401

City

County

State

Zip Code

410-280-6133

Telephone

410-280-8650

Fax Number

3. Applicant has been retained personally or as a member of the above named law firm by John D. Elliott 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 December of 1992, 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 Maryland 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:
United States District Court for the District of Maryland	3/26/1993
Fourth Circuit Court of Appeals	11/12/1997

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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.)

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 John D. Elliott, of the Law Offices of John D. Elliott, P.A. law firm, which has offices at:

1122 Lady Street, Ste. 710

Street Address

Richland

County

803-252-9236

Telephone

Columbia

City

South Carolina

State

29202

Zip Code

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

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).

Not Applicable

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 5th day of October, 2015.

Peter A. Holland

APPLICANT

VERIFICATION

STATE OF MARYLAND)

COUNTY OF ANNE ARUNDEL)

I, Peter A. Holland, 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.

Peter A. Holland

APPLICANT/AFFIANT

Subscribed and sworn to before me this 5th day of October, 2015.

Patricia A. Rodewsky

Notary Public for the State of Maryland

My Commission Expires: 5-18-18

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 30 th day of October, 2015.

John D. Elliot
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 30 th day of October, 2015.

John D. Elliot
APPLICANT/AFFIANT
For Peter A. Holland

**Court of Appeals
of Maryland**
Annapolis, MD



CERTIFICATE OF GOOD STANDING

STATE OF MARYLAND, ss:

*I, Bessie M. Decker, Clerk of the Court of Appeals of Maryland,
do hereby certify that on the sixteenth day of December, 1992,*

Peter Albert Holland

*having first taken and subscribed the oath prescribed by the Constitution and
Laws of this State, was admitted as an attorney of said Court, is now in good
standing, and as such is entitled to practice law in any of the Courts of said
State, subject to the Rules of Court.*

In Testimony Whereof, *I have hereunto
set my hand as Clerk, and affixed the Seal
of the Court of Appeals of Maryland, this
ninth day of October, 2015.*

Bessie M. Decker

Clerk of the Court of Appeals of Maryland