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DEC 10 2015

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

**S.C. Supreme Court**

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

Honorable Doyet. A. Early, III, Circuit Court Judge

CA No. 05-CP-18-1368  
Appellate Case No. 2014-000387

KENNETH SIMMONS, SK5066..... *Petitioner,*

v.

STATE OF SOUTH CAROLINA..... *Respondent.*

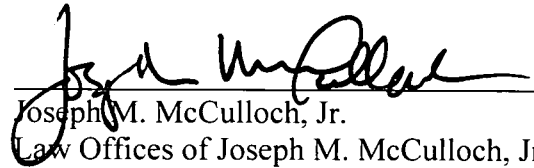
**MOTION FOR ADMISSION PRO HAC VICE**

Through her undersigned counsel, hereby moves the South Carolina Supreme Court to permit Jennifer Pavane Kenter to practice pro ha vice before the Court in the above captioned matter.

Pursuant to SCACR 404, Ms. Kenter, together with undersigned counsel has filed a *Verified Application for Admission Pro Hac Vice* with the South Carolina Supreme Court. Attached hereto is a stamped copy of Ms. Kenter's Verified Application, as it was filed with the Supreme Court.

WHEREFORE, as the provisions set forth in SCACR 404 have been satisfied, the parties request that this motion be granted.

Respectfully submitted this 10<sup>th</sup> day of December, 2015.



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Joseph M. McCulloch, Jr.  
Law Offices of Joseph M. McCulloch, Jr.  
1426 Richland Street  
P.O. Box 11623  
Columbia, South Carolina 29211  
Tel: 803.779.0005  
Fax: 803.779.0666  
Email: [joe@mccullochlaw.com](mailto:joe@mccullochlaw.com)

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**CERTIFICATE OF SERVICE**

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The undersigned, Joseph M. McCulloch, Jr., Esquire, does hereby certify that he has served the persons listed below with a copy of the **MOTION FOR ADMISSION PRO HAC VICE** in the above-captioned proceeding by dispatching a copy to them via U.S., Mail or electronic mail at the address listed below on December 15<sup>th</sup>, 2015.

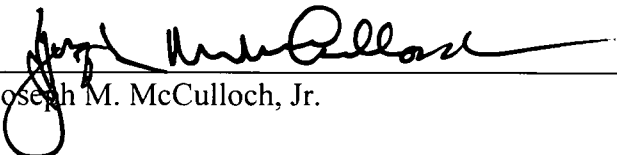
Donald J. Zelenka  
Melody Brown  
SC Attorney General's Office  
P.O. Box 11549  
Columbia, South Carolina 29211

Emily C. Paavola  
Death Penalty Resource & Defense Center  
900 Elmwood Avenue, Suite 200  
Columbia, South Carolina 29201

Jennifer Pavane Kenter, Esq.  
Cooley, LLP  
500 Boylston Street  
Boston, Massachusetts 02116

Adam S. Gershenson, Esq.  
Cooley, LLP  
500 Boylston Street  
Boston, Massachusetts 02116

Lori R. Mason, Esq.  
Cooley, LLP  
500 Boylston Street  
Boston, Massachusetts 02116

  
\_\_\_\_\_  
Joseph M. McCulloch, Jr.

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

State of South Carolina	Appellate Case No. 2014-000387 CA No. 05-CP-18-1368	South Carolina Supreme Court
Plaintiff	Case No.	Tribunal
vs.	Mailing Address of Tribunal:	Supreme Court of South Carolina
Kenneth Simmons, SK5066		PO Box 11330
Defendant		Columbia, SC 29211

Comes now Jennifer Pavane Kenter, applicant herein, and respectfully represents the following:

1.

401 West End Avenue  
 Street Address  
 New York NY 10024  
 City County State Zip Code  
 516-375-5304  
 Telephone

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

1114 Avenue of the Americas  
 Street Address  
 New York NY 10036  
 City County State Zip Code  
 212-479-6000 212-479-6275 jkenter@cooley.com  
 Primary Telephone Cell Phone Fax Number Email Address

3. Applicant has been retained personally or as a member of the above-named law firm by The Innocence Network to provide legal representation in connection with the above case now pending before the above-named tribunal of the State of South Carolina.

4. Since April of 2011, 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 New York where applicant regularly practices law. Attached is a certificate of good) standing dated within the last 90 days from the bar of the highest court of the District of Columbia or the State where applicant regularly practices law.

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:
NY State	April 27, 2011
SDNY	August 9, 2011
EDNY	April 8, 2013
WDNY	January 15, 2013

Court:	Date Admitted:

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 court or administrative body suspended or revoked, except as provided below (give particulars, e.g., date, court, administrative body, date of suspension and reinstatement):

N/A

9. Local counsel of record associated with applicant in this case is Joseph M. McCulloch, Jr. of the Joseph M. McCulloch, Jr. law firm, which has offices at:

1426 Richland St.

Street Address

Columbia

South Carolina

29211

City

County

State

Zip Code

803-779-0005

[joe@mccullochlaw.com](mailto:joe@mccullochlaw.com)

Primary Telephone

Cell Phone

Fax Number

Email Address

0003760

South Carolina Bar Number

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 tribunal for this case only.

DATED this 4<sup>th</sup> day of December 2015

Ji P. Kente  
APPLICANT

VERIFICATION

STATE OF New York )

COUNTY OF New York )

I, Jennifer Pavane Kenter, 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. I understand that I am under a continuing duty to promptly update the information provided in the application until the tribunal has ruled on the motion for admission *pro hac vice*. Further, if the motion is granted, I understand that I am under a continuing duty to promptly update the information provided in the application as long as I continue to appear *pro hac vice* in the action or proceeding. Any updated information shall be provided to both the tribunal that granted the motion and to the tribunal in which the action or proceeding may then be pending.

J. P. Kenter  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 7<sup>th</sup> day of December, 20 15

Tarsha Howard  
Notary Public for the State of New York  
My Commission Expires: April 7, 2016

TARSHA HOWARD  
NOTARY PUBLIC-STATE OF NEW YORK  
No. 01HO6184922  
Qualified in Kings County  
My Commission Expires April 07, 2016

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.

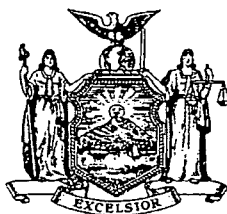
DATED this 8<sup>th</sup> day of December, 20 15

John McQuillan  
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 8<sup>th</sup> day of December, 20 15

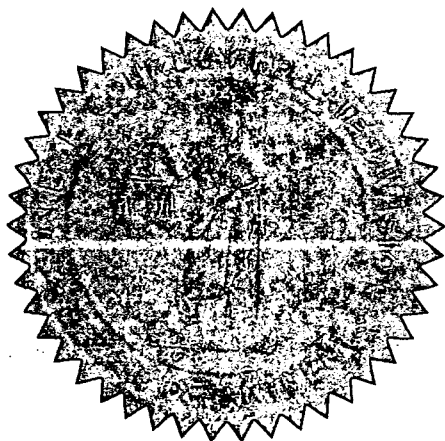
John McQuillan  
APPLICANT/AFFIANT



**Appellate Division of the Supreme Court  
of the State of New York  
Second Judicial Department**

I, Aprilanne Agostino, Clerk of the Appellate Division of the Supreme Court of the State of New York, Second Judicial Department, do hereby certify that Jennifer Pavane Kenter was duly licensed and admitted to practice as an Attorney and Counselor-at-Law in all the courts of the State, according to the laws of the State and the court rules and orders, on the 27<sup>th</sup> day of April 2011, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors-at-Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an Attorney and Counselor-at-Law.

In Witness Whereof, I have hereunto set my hand and affixed the seal of said Appellate Division on November 18, 2015.



*Aprilanne Agostino*

Clerk of the Court