



RECEIVED

JAN 20 2016

SC SUPREME COURT

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

Eric S. Bland*
Ronald L. Richter, Jr.

April 13, 2015

*Also admitted in PA & FL

South Carolina Supreme Court
Office of Bar Admissions
1231 Gervais Street
Columbia, SC 29201

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

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

To Whom It May Concern:

Enclosed is a copy of the Notice, Motion, Verified Application and Proposed Order for the Admission of Kristen G. Atkins, Esquire *Pro Hac Vice* which was submitted on today's date to the Georgetown County Clerk in the above-referenced matter. Also enclosed is the \$250.00 required fee.

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.

RLR/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

(via email)
Kristen G. Atkins, Esquire
Donald G. Hunt, Jr., Esquire
Eric S. Bland, Esquire



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April 13, 2015

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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**

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

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.

RLR/lml
Enclosures

cc: (via Regular US Mail)
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(via email)
Kristen G. Atkins, Esquire
Donald G. Hunt, Jr., Esquire
Eric S. Bland, Esquire

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SC SUPREME COURT

THE STATE OF SOUTH CAROLINA
In the 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

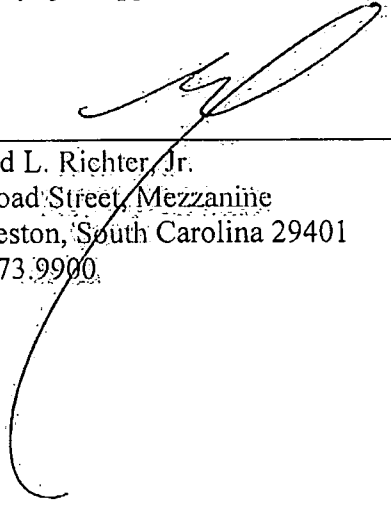
YOU WILL PLEASE TAKE NOTICE, that counsel for the Defendant, Landquest Development, LLC, shall move before this Court on the tenth (10) day after service hereof, or as soon as the same may be heard, pursuant to the South Carolina Rules of Civil and Appellate Procedure for the Admission of Kristen G. 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 12, 2015

BLAND RICHTER, LLP
Attorneys for Appellant



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

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SC SUPREME COURT

**THE STATE OF SOUTH CAROLINA
In the 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.

EXHIBIT A

RECEIVED

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

JAN 20 2016

John Steven Goodwin, et. al.

2009-CP-22-1045/2013-1664

South Carolina Court of Appeals
SC SUPREME COURT

Plaintiff

Case No.

Court

vs.

Landquest Development, LLC, et. al.
Defendant

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

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
City County NC
919-776-6337 27344
Telephone State Zip Code

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 9119-552-3221
Telephone 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:
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

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JAN 20 2016
80 SUPREME COURT

STATE OF NC
COUNTY OF Wilkes

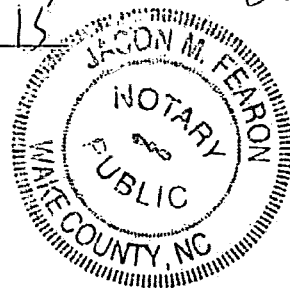
I, Krista Atkins, do hereby swear or affirm under penalty of perjury that I am the applicant in the above styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief,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

[Signature]
APPLICANT/AFFIANT

Subscribed and sworn to before me this 24 day of March, 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/AFFIANT

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JAN 20 2016

50 SUPREME COURT

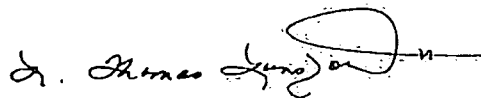
The North Carolina State Bar

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

9th day of March, 2015.



Secretary of the North Carolina State Bar

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SC SUPREME COURT

THE STATE OF SOUTH CAROLINA
In the 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.

PROOF OF SERVICE

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 48th 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



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

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SC SUPREME COURT

THE STATE OF SOUTH CAROLINA
In the 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.

ORDER OF ADMISSION PRO HAC VICE

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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SC SUPREME COURT

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Peoples Building
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18 Broad Street
Charleston, SC 29401
Phone: 843.573.9900
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ronnie@blandrichter.com

Eric S. Bland*
Ronald L. Richter, Jr.

April 13, 2015

*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

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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

Dear Clerk:

Enclosed please find a Notice of Appearance of Donald G. Hunt, Jr. in the above-referenced matter.

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,

s/Ronald Richter
Ronald L. Richter, Jr.

RER/Im
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

(via email)
Kristen G. Atkins, Esquire
Donald G. Hunt, Jr., Esquire
Eric S. Bland, Esquire

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SC SUPREME COURT

**THE STATE OF SOUTH CAROLINA
In the 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,

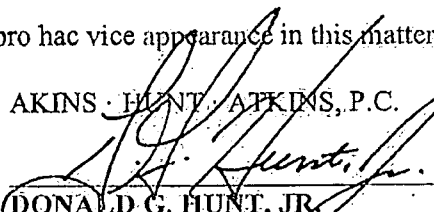
v.

Landquest Development, LLC, et. al. Appellants.

NOTICE OF APPEARANCE OF DONALD G. HUNT, JR.

YOU WILL PLEASE TAKE NOTICE that the undersigned attorneys hereby appear on behalf of Landquest Development, LLC. The undersigned would respectfully request that all future notices, schedules, orders, correspondence and other documents be directed to them in addition to all other counsel of record in this matter. Attached as Exhibit One is a true and accurate copy of the order allowing pro hac vice appearance in this matter.

AKINS · HUNT · ATKINS, P.C.


DONALD G. HUNT, JR.
134 N. Main Street, Suite 204
Post Office Box 266
Fuquay-Varina, NC 27526
Telephone: (919) 552-2020
Facsimile: (919) 552-3221

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JAN 20 2016

SO SUPREME COURT

STATE OF SOUTH CAROLINA
COUNTY OF GEORGETOWN

) IN THE COURT OF COMMON PLEAS
) FIFTEENTH JUDICIAL CIRCUIT
) CIVIL ACTION NO. 2009-CP-22-1045

John Steven Goodwin, et al.,
Plaintiffs,

)
)
)

ORDER
FOR THE ADMISSION OF
DONALD G. HUNT, JR.
PRO HAC VICE

v.

)

Landquest Development, LLC, et al.
Defendants.

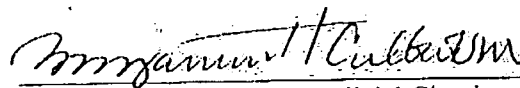
)
)
)

Upon consideration of the motion submitted by local counsel, Ronald L. Richter, Jr., to admit Donald G. Hunt, Jr. *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, Donald G. Hunt, Jr., may appear on behalf of the represented party in accordance with the South Carolina Rules of Civil Procedure.

IT IS SO ORDERED.

June 6, 2013
Georgetown, South Carolina


Presiding Judge, Fifteen Judicial Circuit

FILED
2013 JUN -7 PM 4:06
CLERK

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SC SUPREME COURT

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v.

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PROOF OF SERVICE

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 APPEARANCE OF DONALD G. HUNT, JR.

Counsel:

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

Joseph Qualey, Esquire
23 Broad Street
Charleston, SC 29401

Lawrence Michael Hershon, Esquire

Charles T. Smith, Esquire

James Lynn Werner, Esquire
PO Box 1509
Columbia, SC 29202

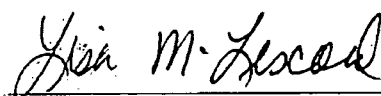
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Georgetown, SC 29440

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

April 13, 2015



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

Matthews, Lindsey

From: Lisa M. Lescord <Lisa@blandrichter.com>
Sent: Wednesday, January 20, 2016 11:27 AM
To: Matthews, Lindsey
Subject: Goodwin v. Landquist (Appellate #2016-000058)
Attachments: 2015-04 Itr SC Supreme Court Office of Bar Admissions - Pro Hac Vice Atkins.pdf; 2015-04 Itr SC Court of Appeals - Pro Hac Vice Atkins.pdf; 2015-04 Itr SC Court of Appeals - NOA Hunt.pdf

Good Morning.

Kindly forgive my confusion, I have attached everything I had scanned into our system regarding the appellate pro hac vice. If there is something missing please just let me know.

Regards,
Lisa

Lisa M. Lescord
Paralegal to Ronald L. Richter, Jr.
Bland Richter, LLP
Peoples Building | 18 Broad Street | Mezzanine Level
Charleston | South Carolina 29401
t: 843.573.9900 | f: 843.573.0200
[Email](#) | [Website](#) | [Blog](#) | [Facebook](#)

IRS Circular 230 DISCLOSURE: Pursuant to United States Treasury Department Regulations, this firm is now required to advise you that, unless otherwise expressly indicated, any federal tax advice contained in this communication, including all attachments and enclosures, is not intended or written to be used, and may not be used, for the purpose of (i) avoiding tax related penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any tax related matters addressed herein.

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