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VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE* MAY -9 2016  
IN THE STATE OF SOUTH CAROLINA

SC SUPREME COURT

<u>Mark Kelley</u> Plaintiff	Opinion No. 5375 (S.C Ct. App. Filed January 13, 2016 Case No.	Supreme Court of South Carolina Tribunal
vs.	Mailing Address of Tribunal:	<u>1231 Gervais St</u> <u>Columbia, SC 29201</u>
<u>David Wren and Sun Publishing Co.</u> Defendant		

Comes now Bruce W. Sanford, applicant herein, and respectfully represents the following:

1. Applicant resides at:  
100 Worth Avenue, Unit 517

<u>Palm Beach</u> City	<u>County</u>	<u>FL</u> State	<u>33480</u> Zip Code
<u>561-366-9302</u> Telephone			

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) BakerHosteler LLP, with offices at 1050 Connecticut Avenue, NW, Suite 1100

<u>Washington</u> City	<u>County</u>	<u>DC</u> State	<u>20036</u> Zip Code
<u>202-861-1626</u> Primary Telephone	<u>202-746-5729</u> Cell Phone	<u>202-861-1783</u> Fax Number	<u>bsanford@bakerlaw.com</u> Email Address

3. Applicant has been retained personally or as a member of the above-named law firm by The Thomas Jefferson Center for the Protection of Free Expression 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 October 7 of 1981, 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 \_\_\_\_\_ 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:
U.S. District Court for the District of Maryland	02.04.1994

Court:	Date Admitted:
U.S. District Court for the District of Columbia	01.04.1982
U.S. District Court for the Southern District of New York	05.24.1983
Ohio State Supreme Court	10.30.1971
U.S. Court of Appeals for the D.C. Circuit	05.25.1990
U.S. Supreme Court	05.02.1977
U.S. Court of Appeals for the First Circuit (01.06.1999); Third Circuit (05.18.1987); Fourth Circuit (Nov. 1983); Fifth Circuit (03.20.1978); Sixth Circuit (04.04.1983); Seventh Circuit (02.10.1981); Eight Circuit (08.11.2000); Ninth Circuit (02.20.1991); Tenth Circuit (09.05.1978); Eleventh Circuit (12.27.1999)	

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

9. Local counsel of record associated with applicant in this case is Kristen McDermott Woodrum of the BakerHostetler LLP law firm, which has offices at:

1170 Peachtree Street, N, Suite 2400

Street Address

Atlanta

Fulton

GA

30309-7512

City

County

State

Zip Code

404-459-0050

843-475-4274

404-459-5734

kwoodrum@bakerlaw.com

Primary Telephone

Cell Phone

Fax Number

Email Address

74220

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).

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 6<sup>th</sup> day of May, 2016

Bruce W. Sanford  
APPLICANT

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VERIFICATION

SC SUPREME COURT

STATE OF \_\_\_\_\_ )

COUNTY OF \_\_\_\_\_ )

I, Bruce W. Sanford, 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.

Bruce W. Sanford  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 6th day of May, 2016

Barbara J. Malloy  
Notary Public for the State of District of Columbia  
My Commission Expires: 11-14-17

BARBARA J. MALLOY  
NOTARY PUBLIC DISTRICT OF COLUMBIA  
My Commission Expires November 14, 2017



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 4th day of May, 2016

Kristen McJermott Woodrum  
LOCAL COUNSEL OF RECORD

CERTIFICATE OF SERVICE

<sup>overnight</sup><sub>mail</sub> I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by ~~PO Box 11330~~ addressed to: South Carolina Supreme Court Office of Bar Admissions, 1231 Gervais Street, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this \_\_\_\_\_ day of \_\_\_\_\_, 2016

Bruce W. Sanford  
APPLICANT/AFFIANT

1231 Gervais Street  
Columbia, SC 29201



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60 SUPREME COURT

District of Columbia Court of Appeals  
Committee on Admissions  
430 F Street, N.W. — Room 123  
Washington, D. C. 20001  
202 / 879-2710

I, JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, do hereby certify that

**BRUCE W. SANFORD**

was on **OCTOBER 7, 1981** duly qualified and admitted as an attorney and counselor entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C. on **May 4, 2016**

JULIO A. CASTILLO  
Clerk of the Court

By: \_\_\_\_\_

*Michelle Stone*  
Deputy Clerk