

# BakerHostetler

## Baker&Hostetler LLP

Washington Square, Suite 1100  
1050 Connecticut Avenue, N.W.  
Washington, DC 20036-5304

T 202.861.1500  
F 202.861.1783  
www.bakerlaw.com

Mark I. Bailen  
direct dial: 202.861.1715  
MBailen@bakerlaw.com

May 6, 2016

### VIA FEDEX

Clerk of the Court  
South Carolina Supreme Court  
1231 Gervais Street  
Columbia, SC 29201

**RECEIVED**

MAY 09 2016

**S.C. SUPREME COURT**

Re: *Kelley v. David Wren and Sun Publishing Co.*  
*Opinion No. 5375 (S.C. Ct. App. Filed January 13, 2016)*

Dear Clerk:

This firm represents proposed *amici curiae* in the above-referenced matter. Please find enclosed for filing the following items in this matter:

- Notice of Appearance of Kristen McDermott Woodrum on behalf of proposed *amici curiae*;
- Motion for Admission *Pro Hac Vice* of Bruce W. Sanford, Mark I. Bailen, and Stephen Derek Bauer, counsel for proposed *amici curiae*, along with their original Verified Applications for Admission *Pro Hac Vice* and copies of their Certificates of Good Standing;
- Motion for Leave to File *Amici Curiae* Brief by Thomas Jefferson Center for the Protection of Free Expression et al. in Support of Petition for Certiorari;
- Proposed Brief of *Amici Curiae* in Support of Petition for Certiorari.

I am enclosing the originals, plus six copies, of each of these filings. I am also enclosing two \$25.00 checks to cover the filing fees for the two Motions.

Clerk of the Court  
May 6, 2016  
Page 2

Please contact me at (202) 861-1715 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Mark I. Bailen". The signature is written in a cursive, slightly slanted style.

Mark I. Bailen  
Partner

Enclosures

▲ Insert Documents Here ▲

Do not ship liquids, blood, or diagnostics in this packaging.

Please use this envelope again!

◀◀ Pull to open

IMPORTANT:

Peel away top adhesive

ORIGIN ID: B2SA (202) 861-1540  
BAKER HOSTETLER, LLP  
1050 CONNECTICUT AVE STE 1100  
WASHINGTON, DC 200365318  
UNITED STATES US

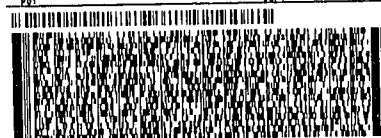
SHIP DATE: 06MAY16  
ACTWT: 2.70 LB  
CAD: OFFC1703  
DIMS: 0x0x0 IN  
BILL SENDER

open ▶▶▶

CLERK OF THE COURT  
SOUTH CAROLINA SUPREME COURT  
1231 GERVAIS ST

COLUMBIA SC 29201

(202) 861-1500 REF: 86P11



FedEx Express



FedEx Envelope Express

RT 104  
EZ 105  
1 10:30  
TT1  
05:09  
E

Weight Limit: 8 Ounces for FedEx Envelope Rate†

Limitation on Contents

† If the gross weight of the contents, FedEx Envelope, and airbill exceeds eight ounces, the next higher rate will apply. Eight ounces is approximately 24 8 1/2" x 14" pages.

Please refer to the FedEx Service Guide at fedex.com for more details about the terms governing your shipping.

• This envelope can be reused if it is in good condition. TO REUSE: Cover or mark through any previous shipping information. FedEx Express will not be liable for damages caused by improper or insufficient packaging.

Do not send cash or cash equivalent.

Declared Value / Liability

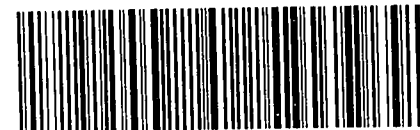
For domestic shipments within the U.S value allowed for a FedEx Envelope is \$500. For within Canada, the maximum declared value all Envelope is CDN\$100. The liability of FedEx for misdelivery, or nondelivery is limited to \$100 or declared and an extra charge paid. Shipments v \$500 (CDN\$100 within Canada) should not be e Please refer to the applicable FedEx Service Gu.

For international shipments by surface or air in FedEx Envelope packaging, the declared value for carriage and customs may not exceed US\$100 or the Warsaw Convention liability limit (in the U.S., \$9.07 per pound), whichever is greater. International shipments with a value in excess of the greater of \$100 or the Warsaw Convention liability limit should not be shipped in this envelope. The liability of FedEx for damage, delay, or loss of international shipments by surface or air may be limited by certain treaties, including the Warsaw Convention. Please refer to the applicable FedEx Service Guide or the FedEx International Air Waybill for more details.

For more information, visit us at fedex.com. In the U.S. call 1.800.GoFedEx 1.800.463.3339 for domestic shipments; 1.800.247.4747 for international shipments. Customers outside the U.S., call your local FedEx office.

TRK# 8060 4774 7771

XH USCA



MON - 09 MAY 10:30A  
PRIORITY OVERNIGHT

DSR  
29201  
SC-US CAE

©2004 Federal Express Corporation.

158011  
158011F60  
REV 1/04 RT



00200

**FedEx** Package  
Express **US Airbill**

FedEx  
Tracking  
Number

8060 4774 7771

Form ID No. 0215 Recipient's Copy

fedex.com 1800.GoFedEx 1800.463.3339

1 From [Redacted]  
Date 5/6/2016

Sender's Name JAMES ROMOSER Phone 202 861-1500

Company BAKER HOSTETLER, LLP

Address 1050 CONNECTICUT AVE STE 1100

City WASHINGTON State DC ZIP 20036-5318

2 Your Internal Billing Reference 106499.0000/

3 To Recipient's Name CLERK of the Court

Company South CAROLINA Supreme Court

Address 1231 GERVAIS STREET  
We cannot deliver to P.O. boxes or P.O. ZIP codes. Dept./Floor/Suite/Floor

Address [Redacted]  
Use this line for the HOLD location address or for continuation of your shipping address.

City Columbia State SC ZIP 29201

HOLD Weekday  
FedEx location address  
REQUIRED. NOT available for  
FedEx First Overnight.  
HOLD Saturday  
FedEx location address  
REQUIRED. Available ONLY for  
FedEx Priority Overnight and  
FedEx 2Day to select locations.

0115054729



8060 4774 7771

4 Express Package Service \*To most locations.  
NOTE: Service order has changed. Please select carefully. Packages up to 150 lbs.  
For packages over 150 lbs., use the  
FedEx Express Freight US Airbill.

Next Business Day:  
 FedEx First Overnight  
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.  
 FedEx Priority Overnight  
Next business morning.\* Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.  
 FedEx Standard Overnight  
Next business afternoon.\* Saturday Delivery NOT available.

2 or 3 Business Days:  
 FedEx 2Day A.M.  
Second business morning.\* Saturday Delivery NOT available.  
 FedEx 2Day  
Second business afternoon.\* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.  
 FedEx Express Saver  
Third business day.\* Saturday Delivery NOT available.

5 Packaging \*Declared value limit \$500.  
 FedEx Envelope\*  FedEx Pak\*  FedEx Box  FedEx Tube  Other

6 Special Handling and Delivery Signature Options  
 SATURDAY Delivery  
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.  
 No Signature Required  
Package may be left without obtaining a signature for delivery.  
 Direct Signature  
Someone at recipient's address may sign for delivery. Fee applies.  
 Indirect Signature  
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only. Fee applies.

Does this shipment contain dangerous goods?  
One box must be checked.  
 No  Yes As per attached Shipper's Declaration.  Yes Shipper's Declaration not required.  Dry Ice Dry Ice, 9, UN 1845 \_\_\_\_\_ x \_\_\_\_\_ kg  
Dangerous goods (including dry ice) cannot be shipped in FedEx packaging or placed in a FedEx Express Drop Box.  Cargo Aircraft Only

7 Payment Bill to:  
Enter FedEx Acct. No. or Credit Card No. below. Obtain recip. Acct. No.   
 Sender Acct. No. in Section will be billed.  Recipient  Third Party  Credit Card  Cash/Check

Total Packages 1 Total Weight 3 lbs. Credit Card Auth. [Redacted]

1 Our liability is limited to US\$100 unless you declare a higher value. See the current FedEx Service Guide for details. 611

fedex.com 1800.GoFedEx 1800.463.3339