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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Joseph M. Strickland, Master-in-Equity for Richland County

Appellate Case No. 2016-000958

Wells Fargo Bank, N.A., Plaintiff,

v.

William R. Hudspeth, Marcia E. Hudspeth; TD Bank, N.A. s/b/m to Carolina First Bank; The Lender Group, Inc.; Business Carolina, Inc.; South Carolina Department of Revenue; Carapace, LLC; Wurth Wood Group, Inc.; The Estate of Harry William Boyd, by Joan L. Boyd, Personal Representative; Adecco USA, Inc., Defendants,

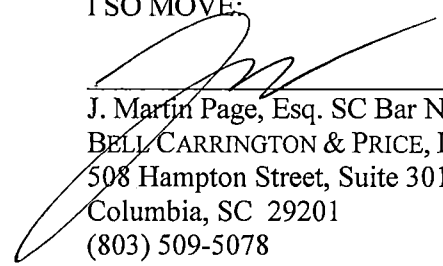
Of Whom TD Bank, N.A. successor by merger to Carolina First Bank is the Appellant,
and Of Whom The Lender Group, Inc. is the Respondent.

MOTION FOR ADMISSION *PRO HAC VICE*

Pursuant to Rule 404, SCACR, J. Martin Page of the firm of Bell Carrington & Price, LLC, the undersigned counsel for the Appellant, TD Bank, N.A. successor by merger to Carolina First Bank ("TD Bank"), and a member in good standing of the South Carolina Bar, hereby moves this Honorable Court for an Order admitting Brett L. Messinger, Esq. *pro hac vice* in this case as co-counsel for the Appellant, together with the attached Verified Application for Admission *Pro Hac Vice* and supporting documentation.

August 16, 2016

I SO MOVE:



J. Martin Page, Esq. SC Bar No.: 100200
BELL CARRINGTON & PRICE, LLC
508 Hampton Street, Suite 301
Columbia, SC 29201
(803) 509-5078
mpage@bellcarrington.com
Attorney for Appellant

Attachments

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 J. Martin Page, of the Bell Carrington law firm, which has offices at:

508 Hampton Street, Suite 301

Street Address

Columbia

City

(803) 509-7692

Telephone

Richland

County

South Carolina

State

29201

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).

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 11th day of August, 2016.

[Signature]
APPLICANT

<u>TITLE OF COURT</u>	<u>DATE ADMITTED</u>	<u>BAR NUMBER</u>
Supreme Court of Pennsylvania	12/09/1991	63020
Supreme Court of New York	08/21/2001	3987542
Supreme Court of New Jersey	12/19/1991	035631991
Supreme Judicial Court of Maine	2/20/2015	005512
United States District Court for the Eastern District of Pennsylvania	02/05/1992	63020
United States District Court for the Western District of Pennsylvania		63020
United States District for the Southern District of New York	10/29/1996	BM-5092
United States District Court for the Eastern District of New York	02/16/2007	BM-5092
United States District Court for the District of New Jersey	12/19/1991	N/A
United States District Court for the Middle District of Pennsylvania	02/14/2005	63020
United States District Court for the Northern District of Florida	06/26/2008	N/A
United States District Court for the Northern District of New York	11/07/2008	515347
United States District Court for the Western District of New York	04/30/2010	N/A
United States District Court for the Eastern District of Michigan	08/21/2009	N/A
United States Court of Appeals for the First Circuit	02/25/2016	1174057
United States Court of Appeals for the Third Circuit	08/21/2001	N/A
United States Court of Appeals for the Fourth Circuit	10/01/2015	N/A
United States Court of Appeals for the Ninth Circuit		N/A
United States Court of Appeals for the Eleventh Circuit	05/29/2007	N/A

Active in all courts listed above.

VERIFICATION

STATE OF Pennsylvania

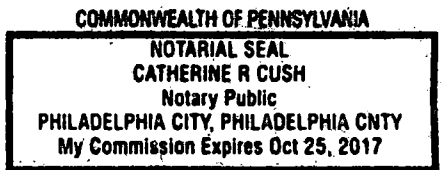
COUNTY OF Philadelphia

I, Brett L. Messing, 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 11th day of August, 2016.

Catherine R. Cush
Notary Public for the State of Pennsylvania
My Commission Expires: 10-25-17



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 15th day of August, 2016.

[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 16th day of August, 2016.

[Signature]
APPLICANT/AFFIANT



Supreme Court of Pennsylvania

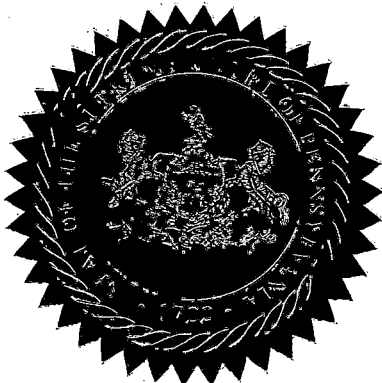
CERTIFICATE OF GOOD STANDING

Brett Lawrence Messinger, Esq.

DATE OF ADMISSION

December 3, 1991

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: August 9, 2016

John W. Person, Jr.

**John W. Person Jr., Esq.
Deputy Prothonotary**

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APPEAL FROM RICHLAND COUNTY
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Joseph M. Strickland, Master-in-Equity for Richland County

Appellate Case No. 2016-000958

Wells Fargo Bank, N.A.Plaintiff

v.

William R. Hudspeth, Marcia E. Hudspeth; TD Bank, N.A. s/b/m to Carolina First Bank; The Lender Group, Inc.; Business Carolina, Inc.; South Carolina Department of Revenue; Carapace, LLC; Wurth Wood Group, Inc.; The Estate of Harry William Boyd, by Joan L. Boyd, Personal Representative; Adecco USA, Inc.Defendants

Of Whom TD Bank, N.A. successor by merger to Carolina First Bank is the..... Appellant,
and Of Whom The Lender Group, Inc. is the..... Respondent.

PROOF OF SERVICE

I, the undersigned attorney for TD Bank, N.A., do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail , postage prepaid, to the following address(es):

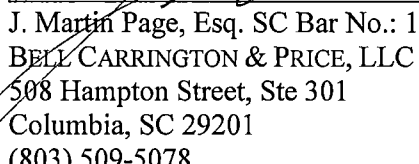
Pleadings:

Motion for Admission *Pro Hac Vice*

Counsel Served:

Robert Lewis, Esq.
Christopher Boguski, Esq.
Rogers Lewis Jackson Mann & Quinn, LLC
1330 Lady St., Suite 400
Columbia, SC 29201

Columbia, South Carolina
August 16, 2016



J. Martin Page, Esq. SC Bar No.: 100200
BELL CARRINGTON & PRICE, LLC
508 Hampton Street, Ste 301
Columbia, SC 29201
(803) 509-5078
mpage@bellcarrington.com
Attorney for Appellant

BELL | CARRINGTON
ATTORNEYS AT LAW

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court
SC Court of Appeals
1015 Sumter Street - 5th Floor
Columbia, SC 29201

VIA HAND DELIVERY

August 16, 2016

RE: Appellate Case No. 2016-000958

Dear Ms. Kitchings:

Enclosed please find the original and seven copies of the Appellant's Motion for Admission *Pro Hac Vice* in regard to the above-referenced matter. We would ask that you file the original and return a clocked-in copy to us. Also enclosed is our check in the amount of \$25.00 as the required filing fee.

Sincerely,


J. Martin Page, Esq.

Enclosures

cc: Robert E. Lewis, Esquire

870 CLEVELAND STREET • SUITE 1B
GREENVILLE, SC 29601
OFFICE: (864) 272-0556 • FAX: (864) 752-1075

578 EAST BAY STREET • SUITE B
CHARLESTON, SC 29403
OFFICE: (843) 531-6480 • FAX: (843) 531-6481

508 HAMPTON STREET • SUITE 301
COLUMBIA, SC 29201
OFFICE: (803) 509-5078 • FAX: (803) 753-9841

BELL CARRINGTON & PRICE, LLC