

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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SEP 09 2016

SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge
Tamara Curry, Probate Court Judge

Appellate Case No. 2014-002020
Circuit Court Case No.2011-CP-007819

Betty Fisher,Appellant
v.
Bessie Huckabee Respondent

Appellate Case No. 2014-002028
Circuit Court Case No.2011-CP-007821

Lisa Fisher,Appellant
v.
Bessie HuckabeeRespondent

Appellate Case No. 2014-002034
Circuit Court Case No.2011-CP-008657

Lisa Fisher,Appellant
v.
Bessie HuckabeeRespondent

**APPELLANTS' MOTION FOR ADMISSION OF LISA FISHER, ESQUIRE
AS PRO HAC VICE AND ASSOCIATED COUNSEL FOR PURPOSES OF SCHEDULED
CONSOLIDATED ORAL ARGUMENT
ON OCTOBER 3, 2016 AT 10:40 A.M. IN COURTROOM 1**

JOHN HUGHES COOPER, ESQUIRE
1476 Ben Sawyer Blvd. Ste. 11
Mount Pleasant, SC 29464
shiplaw@jhcooper.com
843-883-9099; fax 843-883-9335

(Attorneys for Appellants)

COME NOW Appellants Betty Fisher and Lisa Fisher, by counsel John Hughes Cooper, Esquire, as attorney in good standing in South Carolina, pursuant to South Carolina Appellate Court Rules, respectfully move this Court to grant Lisa Fisher, not being lawfully licensed and admitted to the practice of law in the State of South Carolina, the privilege to appear in this Court as attorney on behalf of Appellant Betty Fisher and as associated counsel on her own matters, for purposes of oral argument.

In support of this Motion, the Verified Application for Admission *Pro Hac Vice* of Lisa Fisher in the State of South Carolina is attached hereto. In addition, the prescribed fees for admission pro hac vice have been tendered with a copy of the application to the South Carolina Supreme Court simultaneously with the filing of this Motion.

Rule 404 of the South Carolina Appellate Court Rules provides for Admission *Pro Hac Vice* of attorneys in good standing in the highest Court of another state. Lisa Fisher, Esquire is such an attorney in good standing. (Attached hereto is a true and correct copy of said certificate from the California Supreme Court).

Finally, this motion also seeks to have Ms. Fisher associated as counsel in her own matters, Appellate case nos. 2014-002028 and 2014-002034. The court has consolidated for oral argument these appeals, and Ms. Fisher, as requested by our client Betty Fisher, and by our request, ask this court to permit her to appear and argue at this hearing.

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Appellants pray that this Court grant this motion in its entirety.

RESPECTFULLY SUBMITTED,

JOHN HUGHES COOPER, P.C.

By: _____
JOHN HUGHES COOPER, ESQUIRE

Federal Court ID 298

South Carolina Bar 1387

State Bar of Georgia 185986

1476 Ben Sawyer Blvd. Ste. 11

Mount Pleasant, SC 29464

shiplaw@jhcooper.com

843-883-9099; fax 843-883-9335

ATTORNEYS FOR APPELLANTS

September 9, 2016

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

SEP 09 2016

SC Court of Appeals

BETTY FISHER

2014-002020

The South Carolina Court of Appeals

LISA FISHER

2014-002028

(For Oral Argument)

LISA FISHER

2014-002034

Plaintiff

Case No.

Court

vs.

Mailing Address of Court:

P.O. BOX 11629

BESSIE HUCKABEE

Columbia, South Carolina 29211

Defendant

Comes now Lisa Fisher, applicant herein, and respectfully represents the following:

1. Applicant resides at:

Law Offices of Lisa Fisher; P.O. Box 91112

Street Address

Long Beach

Los Angeles

CA

90809-1112

City

County

State

Zip Code

562-965-3267

Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Law Office

of Lisa Fisher, with offices at, at

P.O. Box 91112

Street Address

Long Beach

Los Angeles

CA

90809-1112

City

County

State

Zip Code

562-965-3267

Telephone

866-610-4371

Fax Number

3. Applicant has been retained personally or as a member of the above named law firm by Betty Fisher 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 December of 1997, 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 California 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:

Supreme Court of the United States	03-19-2001
California State, Appellate and Supreme Courts	12/1997
United State District Court, Central District of California	12/1997
United States District Court, Southern District of California	1997

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.)

Not Applicable

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):

Not Applicable

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):

Not Applicable

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):

Not Applicable

9. Local counsel of record associated with applicant in this case is John Hughes Cooper, Esquire, of the John Hughes Cooper, P.C. law firm, which has offices at:

1476 Ben Sawyer Bl. Ste. 11

Street Address

Charleston

County

843-883-9099

Telephone

Mt. Pleasant

City

SC

State

29464

Zip Code

If applicable list all other firms/attorneys you are associated with in this matter

Not Applicable

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).

Betty Fisher v. Bessie Huckabee et al. In re Alice Shaw Baker; 2009-CP-10-3010; Case Pending for Trial; Order granted 6/17/2009; Local Counsel; John Hughes Cooper, Esquire

Betty Fisher v. Bessie Huckabee et al. In re Alice Shaw Baker; 2012-CP-10-1332; Case Dismissed; Order granted 3/29/12; Local Counsel; John Hughes Cooper, Esquire

Betty Fisher v. Bessie Huckabee et al. In re Alice Shaw Baker; 2014000175; Case Dismissed; Order granted 3/24.14; Local Counsel; John Hughes Cooper, Esquire

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 8th day of September, 2016

APPLICANT

VERIFICATION

STATE OF California)

COUNTY OF Los Angeles)

I, Lisa Fisher, 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 ___ day of ___, 20__.

SEE ATTACHED

Notary Public for the State of ___

My Commission Expires: ___

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 9th day of September, 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 9th day of September, 2016.

[Signature]

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SC Court of Appeals

JURAT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

STATE OF CALIFORNIA

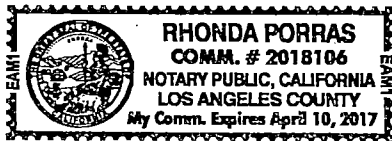
COUNTY OF LOS ANGELES

Subscribed and sworn to (or affirmed) before me on

this 8th day of September, 2016

by Lisa Fisher

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.



Signature

A handwritten signature in black ink, appearing to read "Rhonda Porras", written over a horizontal line.

(seal)

ATTACHED TO DOCUMENT: VERIFIED APPLICATION FOR ADMISSION PRO HAC VICE IN THE STATE OF SOUTH CAROLINA / VERIFICATION

PAGE: 3



THE STATE BAR OF CALIFORNIA

MEMBER RECORDS & COMPLIANCE

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

CERTIFICATE OF STANDING

June 20, 2016

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, LISA FISHER, #192777 was admitted to the practice of law in this state by the Supreme Court of California on December 9, 1997; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in cursive script, appearing to read "Kathan Lambert".

Kathan Lambert
Custodian of Membership Records

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge

Appellate Case No. 2014-002020

Circuit Case No. 2011-CP-10-7819

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BETTY FISHERAppellant

v.

BESSIE HUCKABEE.....Respondent

Appellate Case No. 2014-002028

Circuit Case No. 2011-CP-10-7821

LISA FISHER.....Appellant

v.

BESSIE HUCKABEE.....Respondent

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Appellate Case No. 2014-002034

Circuit Case No. 2011-CP-10-8657

LISA FISHER.....Appellant

v.

BESSIE HUCKABEE.....Respondent

PROOF OF SERVICE

I certify that I have served the **Appellants' Motion for Admission of Lisa Fisher, Esquire as Pro Hac Vice and Associated Counsel, Verified Application and Certificate of Standing** upon Respondent Bessie Huckabee by depositing a copy of it in the United States Mail, postage prepaid, on September 9, 2016, addressed to her attorney of record Peter A. Kouten, Esquire, P.O. Box 340, Johns Island, SC 29457.

September 9, 2016 RESPECTFULLY SUBMITTED,

JOHN HUGHES COOPER, P.C.

By: 
JOHN HUGHES COOPER, ESQUIRE

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