

# The Supreme Court of South Carolina

DANIEL E. SHEAROUSE  
CLERK OF COURT

BRENDA F. SHEALY  
CHIEF DEPUTY CLERK

POST OFFICE BOX 11330  
COLUMBIA, SOUTH CAROLINA 29211  
TELEPHONE: (803) 734-1080  
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October 13, 2016

The Honorable Daniel E. Shearouse  
Clerk of Court  
South Carolina Supreme Court  
Post Office Box 11330  
Columbia, S.C. 29211

RE: Reid Harold Donze v. General Motors LLC  
Case No.: 2016-001437

Dear Mr. Shearouse:

I certify that the Office of Bar Admissions has received a verified application requesting John Mark Thomas be admitted *pro hac vice* in the above matter. Pursuant to Rule 244(d), SCACR, Mr. Thomas was not required to pay the \$250.00 filing fee.

Yours truly,

Deputy Clerk for Bar Admissions

GBW/st

# **Bowman and Brooke** LLP

Attorneys at Law

1441 Main Street, Suite 1200  
Columbia, SC 29201  
Phone: 803.726.7420  
Fax: 803.726.7421

Angela G. Strickland  
Direct: 803.726.7424  
Email: [angela.strickland@bowmanandbrooke.com](mailto:angela.strickland@bowmanandbrooke.com)

October 11, 2016

S. Kirkpatrick Morgan, Esq.  
Charles T. Slaughter, Esq.  
Walker & Morgan, LLC  
P.O. Box 949  
Lexington, SC 29071

Ronnie L. Crosby, Esq.  
Austin H. Crosby, Esq.  
Peters Murdaugh Parker Eltzroth & Detrick, PA  
101 Mulberry Street East, P.O. Box 457  
Hampton, SC 29924

Bert G. Utsey, III, Esq.  
Peters Murdaugh Parker Eltzroth & Detrick, PA  
P.O. Box 1164  
Walterboro, SC 29488

Re: Reid H. Donze v. General Motors, LLC et al  
Civil Action No.: 6:13-CV-02153-TMC  
Appellate Case No. 2016-001437

Dear Counsel:

Enclosed and hereby served upon you by mail, please find a Motion for *Pro Hac Vice* on behalf of John Mark Thomas which was filed today with the Supreme Court of South Carolina.

Sincerely,



Angela G. Strickland  
Partner

AGS/lap  
Enclosure

**THE STATE OF SOUTH CAROLINA**  
**In The Supreme Court**

Reid Harold Donze, Plaintiff

v.

General Motors, LLC, Defendant.  
Appellate Case No. 2016-001437

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**S.C. SUPREME COURT**

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**MOTION FOR ADMISSION, *PRO HAC VICE***

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Pursuant to Rule 404 and Rule 244(d) of the South Carolina Appellate Court Rules, Joel H. Smith, Esquire, Angela G. Strickland, Esquire, and Kevin J. Malloy, Esquire of Bowman and Brooke LLP respectfully request the Court enter an Order permitting John Mark Thomas, Esquire to appear *pro hac vice* in this matter as counsel for Defendant General Motors LLC and would show the Court as follows:

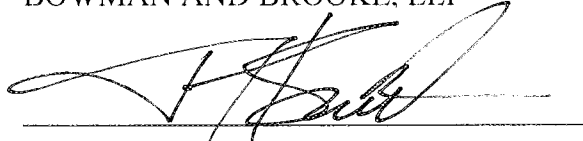
1. John Mark Thomas, Esquire is a member in good standing of the Bar of highest court of the State of Michigan. Additionally, Mr. Thomas is an attorney with Dykema Gossett, PLLC, 2723 South State Street, Suite 400, Ann Arbor, Michigan 48104.
2. Mr. Thomas is handling this matter in association with Joel H. Smith, Angela G. Strickland, and Kevin J. Malloy, who are members in good standing of the South Carolina Bar and the United States District Court for the District of South Carolina.
3. This application and motion are made pursuant to Rule 244(d), as this matter is

before the court on an Order agreeing to answer certified questions dated August 18, 2016.

4. This motion is supported by the attached Verified Application for Admission *Pro Hac Vice* of John Mark Thomas, a copy of which has been served via Hand Delivery on the South Carolina Supreme Court Office of Bar Admissions, without the application fee as outlined in Rule 244(d).

THEREFORE, the movants pray for an Order of this Court permitting the appearance of John Mark Thomas, Esquire, *pro hac vice* in this action as counsel for the Defendant General Motors LLC.

BOWMAN AND BROOKE, LLP



Joel H. Smith

(SC Bar #5266 / Fed. ID #3910)

joel.smith@bowmanandbrooke.com

Angela G. Strickland

(SC Bar #73705 / Fed. ID #9824)

angela.strickland@bowmanandbrooke.com

Kevin J. Malloy

(SC Bar #100170 / Fed. ID #11419)

1441 Main Street, Suite 1200

Columbia, SC 29201

Tel: 803-726-7420

Attorneys for Defendant General Motors  
LLC

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

Reid Harold Donze	2016-001437	The Supreme Court of South Carolina
Plaintiff	Case No.	Tribunal
vs.		
General Motors LLC	Mailing Address of Tribunal:	1231 Gervais Street
Defendant		Columbia, SC 29201

Comes now John Mark Thomas, applicant herein, and respectfully represents the following:

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1. Applicant resides at:

2460 Waterfront Drive	Livingston	Michigan	48114
Street Address	County	State	Zip Code
Brighton	(810) 229-0035		
City	Telephone		

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Dykema Gossett PLLC, with offices at 2723 South State Street, Suite 400

Ann Arbor	Washtenaw	Michigan	48104
City	County	State	Zip Code
(734) 214-7613	(248) 705-2960	(734) 214-7696	jthomas@dykema.com
Primary Telephone	Cell Phone	Fax Number	Email Address

3. Applicant has been retained personally or as a member of the above-named law firm by General Motors LLC 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 June 20 of 1980, 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 Michigan 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:
Supreme Court of the United States	04/15/1991
U.S. Court of Appeals for the 3 <sup>rd</sup> Circuit	08/23/1985

Court:	Date Admitted:
U.S. Court of Appeals for the 4 <sup>th</sup> Circuit	09/30/1985
U.S. Court of Appeals for the 5 <sup>th</sup> Circuit	1986
U.S. Court of Appeals for the 6 <sup>th</sup> Circuit	01/17/1989
U.S. Court of Appeals for the 7 <sup>th</sup> Circuit	02/08/1991
U.S. Court of Appeals for the 8 <sup>th</sup> Circuit	07/28/1992
U.S. Court of Appeals for the 9 <sup>th</sup> Circuit	03/05/1993
U.S. Court of Appeals for the 10 <sup>th</sup> Circuit	10/15/1987
U.S. Court of Appeals for the 11 <sup>th</sup> Circuit	06/03/2010
U.S. District Court for the Central District of California	10/01/2010
U.S. District Court for the Southern District of California	02/14/2011
U.S. District Court for the Northern District of California	2011
U.S. District Court for the Northern District of Illinois	12/10/2011
U.S. District Court for the Eastern District of Michigan	05/12/1992
U.S. District Court for the Eastern District of New York	10/06/2010
U.S. District Court for the Southern District of Ohio	07/31/2014
U.S. District Court for the Northern District of Ohio	09/20/2010
U.S. District Court for the Eastern District of Pennsylvania	12/14
U.S. District Court for the Middle District of Pennsylvania	2015

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.)

Pennsylvania (inactive).

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):

No.

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):

None.

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):

None.

9. Local counsel of record associated with applicant in this case is Joel H. Smith  
of the Bowman and Brooke law firm, which has offices at:

1441 Main Street, Suite 1200

Street Address

Columbia

City

(803) 726-7422

Primary Telephone

Richland

County

(803) 429-7825

Cell Phone

SC

State

(803) 726-7421

Fax Number

29201

Zip Code

joel.smith@bowmanandbrooke.com

Email Address

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).

None.

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 30<sup>th</sup> day of September, 20 16

  
\_\_\_\_\_  
APPLICANT

**VERIFICATION**

STATE OF MICHIGAN )

COUNTY OF WASHTENAW )

I, JOHN MARK THOMAS, 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.

  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 30<sup>th</sup> day of September, 20 16

Notary Public for the State of Michigan

My Commission Expires: 09/26/2017

**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 11<sup>th</sup> day of October, 20 16

  
LOCAL COUNSEL OF RECORD

**CERTIFICATE OF SERVICE**

~~mail~~ <sup>hand-delivery</sup> 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

11<sup>th</sup> day of October, 20 16

fee waived  
per Rule 204(a).

  
APPLICANT/AFFIANT

**THE SUPREME COURT of the STATE OF MICHIGAN**

I, Larry S. Royster, Clerk of the Michigan Supreme Court and Custodian of the Roll of Attorneys admitted to the practice of law in this state, do hereby certify that, as appears from the records,

*John Mark Thomas*

was admitted to the practice of law in the courts of the State of Michigan on

*June 20, 1980*

and has remained in good standing since then.

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In Testimony Whereof, I set my hand and  
affix the seal of the Michigan Supreme  
Court on this date: September 21, 2016



Clerk