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S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

APPEAL FROM BARNWELL COUNTY
COURT OF COMMON PLEAS

The Honorable R. Markley Dennis, Jr.

Appellate Case No. 2016-000428

JAMES JEFFERSON JOWERS, SR., ANDREW J. ANASTOS,
BEN WILLIAMSON, MELANIE RUHLMAN, AND
ANTHONY RUHLMAN, APPELLANTS,

v.

SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL, RESPONDENT.

**MOTION BY CONGAREE RIVERKEEPER, INC. TO ADMIT
JOHN D. ECHEVERRIA *PRO HAC VICE***

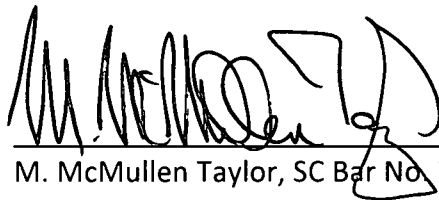
Congaree Riverkeeper, Inc. hereby moves to admit John D. Echeverria *pro hac vice* to enter an appearance for Congaree Riverkeeper as co-counsel for its Motion for Leave to File a Brief of *Amicus Curiae* as well as the Brief itself. John D. Echeverria is a Professor of Law at the Vermont Law School with nationally recognized expertise on the legal theories raised in this matter. Mr. Echeverria's Verified Application for Admission *Pro Hac Vice* is attached. He is a member in good standing of the District of Columbia Court of Appeals and agrees to be bound by

the applicable South Carolina Rules Governing the Practice of Law. Mr. Echeverria's address for the purpose of receiving service of motions, briefs, orders and other papers is as follows:

John D. Echeverria, Esquire
Vermont School of Law
164 Chelsea Street
Post Office Box 96
South Royalton, Vermont 05068
jecheverria@vermontlaw.edu

Ms. M. McMullen Taylor, counsel for Congaree Riverkeeper, is admitted to practice in the State of South Carolina, and is a member in good standing of the South Carolina Bar.

Respectfully submitted,



M. McMullen Taylor, SC Bar No. 72848
MULLEN TAYLOR, LLC
1230 Richland Street
Columbia, South Carolina 29201
(803) 254-1344

Counsel for Congaree Riverkeeper, Inc.

Columbia, South Carolina
Nov 14, 2016

Court:	Date Admitted:
U.S. Court of Appeals for the District of Columbia Circuit	April 8, 1983
U.S. Court of Appeals for the Fifth Circuit	March 7, 1983
U.S. Supreme Court	June 21, 1993

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.)

N/A

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):

N/A

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):

N/A

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):

N/A

9. Local counsel of record associated with applicant in this case is M. McMullen Taylor of the Mullen Taylor LLC law firm, which has offices at:

1230 Richland St
 Street Address
Columbia Richland SC 29201
 City County State Zip Code
803-254-1344 803-917-9931 803-253-6084 mmt@MullenTaylorLLC.com
 Primary Telephone Cell Phone Fax Number Email Address
72848

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).

Columbia Venture LLC v. Richland County: date of application June 27, 2013. Application granted. Case is closed. Local counsel: M. McMullen Taylor.
 McQueen v. S.C. Coastal Council: case closed. Application granted. Local counsel: Leslie W. Stidham.

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 9th day of November, 2016

Julie Scheweic
APPLICANT

VERIFICATION

STATE OF Vermont)

COUNTY OF Windsor)

I, John Echeverri, 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.

John Echeverri
APPLICANT/AFFIANT

Subscribed and sworn to before me this 9th day of November, 20 16

[Signature]

Notary Public for the State of Vermont

My Commission Expires: 2/10/19

LOCAL COUNSEL CONSENT

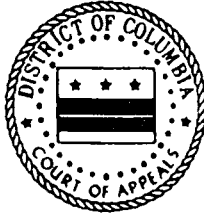
I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 14th day of November, 20 16
[Signature]
LOCAL COUNSEL OF RECORD

CERTIFICATE OF SERVICE

hand deliver
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 14th day of November, 20 16

[Signature]
APPLICANT/AFFIANT



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

JOHN D. ECHEVERRIA

was on DECEMBER 13, 1982 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 November 10, 2016.

JULIO A. CASTILLO
Clerk of the Court

By: *Monette Lane*
Deputy Clerk

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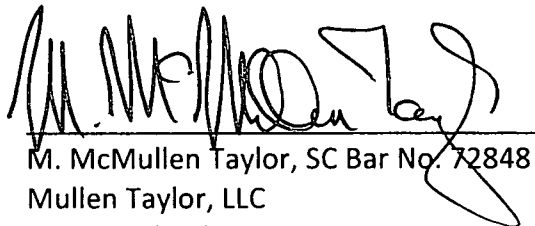
I certify that I have served upon the Parties' counsel Congaree Riverkeeper's Motion for Leave to File a Brief of *Amicus Curiae* with Brief conditionally attached, and Motion to Admit John D. Echeverria *Pro Hac Vice* as co-counsel for Congaree Riverkeeper, by depositing a copy of it in the United States Mail, postage prepaid, and by electronic mail, on this the 14 day of November, 2016, addressed to counsel of record, as follows:

Amy E. Armstrong
Amelia A. Thompson
Jessie A. White
South Carolina Environmental Law Project
Post Office Box 1380
Pawleys Island, South Carolina 29585
amy@scelp.org

The Honorable Alan Wilson, Attorney General
Robert D. Cook, Solicitor General
J. Emory Smith Jr., Deputy Solicitor General
T. Parkin Hunter, Senior Assistant Attorney General
Post Office Box 11549
Columbia, South Carolina 29211
esmith@scag.gov

Michael S. Traynham, Assistant General Counsel
S.C. Department of Health and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201
traynhms@dhec.gov

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lreynolds@asrlawsc.com



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Counsel for Congaree Riverkeeper, Inc.

Columbia, South Carolina
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