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THE STATE OF SOUTH CAROLINA
In The Supreme Court

S.C. SUPREME COURT

CERTIFIED QUESTIONS FROM
THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF
SOUTH CAROLINA

Timothy M. Cain, United States District Judge

Appellate Case No. 2016-001437

Reid Harold Donze Plaintiff
v.
General Motors, LLC Defendant

MOTION TO ADMIT COUNSEL PRO HAC VICE – PHIL S. GOLDBERG

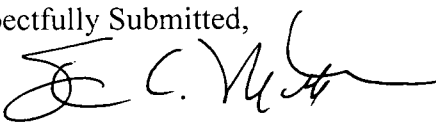
Pursuant to Rule 404, SCACR , *amicus curiae* Alliance of Automobile Manufacturers, Inc. (“the Alliance”) moves for the admission *pro hac vice* of Phil S. Goldberg, Esq., as counsel for in connection with this appeal. In support of this motion, the undersigned shows the court as follows:

1. Mr. Goldberg is a practicing member in good standing in Washington, D.C., which grants like privileges to out-of-state attorneys to practice on a *pro hac vice* basis. He is a partner with the law firm of Shook, Hardy & Bacon, L.L.P. and works in its office located at 1155 F Street, NW, Suite 200, Washington, DC 20004.
2. A copy of Mr. Goldberg’s Verified Application for Admission *Pro Hac Vice*, including a Certificate of Good Standing in the Bar of the District of Columbia Court of Appeals, is attached as Exhibit A. Mr. Goldberg agrees to be bound by the applicable South Carolina Rules Governing the Practice of Law.

3. The undersigned, Steve A. Matthews, is admitted to practice in the State of South Carolina, is a member in good standing of the South Carolina Bar, and will be associated with Mr. Goldberg and will be counsel of record on behalf of the Alliance in this matter.

WHEREFORE, the undersigned respectfully requests that the Court order the admission *pro hac vice* of Phil S. Goldberg as counsel for *amicus curiae* Alliance of Automobile Manufacturers, Inc. in connection with this case.

Respectfully Submitted,

By: 

Steve A. Matthews

S.C. Bar 3689

HAYNSWORTH SINKLER BOYD, P.A.

1201 Main Street, 22nd Floor

Columbia, SC 29201

(803) 779-3080

smatthews@hsblawfirm.com

*Counsel for Amicus Curiae Alliance of Automobile
Manufacturers, Inc.*

November 15, 2016

Exhibit A

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

Reid Harold Donze

2016-0001437

Supreme Court of South Carolina

Plaintiff

Case No.

Court

vs.

General Motors, LLC

Mailing Address of Court: Supreme Court Building

1231 Gervais Street

Columbia, South Carolina 29201

Defendant

Comes now Philip S. Goldberg, applicant herein, and respectfully represents the following:

1. Applicant resides at:

9500 Single Drive

Street Address

Bethesda

Montgomery County

Maryland

20817

City

County

State

Zip Code

301-564-0099

Telephone

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

Shook, Hardy & Bacon L.L.P.

, with offices at, at

1155 F Street, NW, Suite 200

Street Address

Washington

D.C.

20004

City

County

State

Zip Code

202-783-8400

202-783-4211

Telephone

Fax Number

3. Applicant has been retained personally or as a member of the above named law firm by Alliance for Automobile Manufacturers 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 October of 2004, 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 _____ 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: |
|--|----------------|
| District of Columbia Court of Appeals | 2005 |
| US Court of Appeals for the Third Circuit | 2007 |
| US Court of Appeals for the Fourth Circuit | 2015 |
| US Court of Appeals for the Fifth Circuit | 2010 |
| US Court of Appeals for the Sixth Circuit | 2010 |
| US Court of Appeals for the Ninth Circuit | 2010 |
| Supreme Court of the United States | 2010 |
| Maryland | 2001 |
| New Jersey | 2001 |

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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 administrative body suspended or revoked, except as provided below (give particulars, e.g., date, administrative body, date of suspension and reinstatement):

N/A

9. Local counsel of record associated with applicant in this case is Steve A. Matthews, of the Haynsworth Sinkler Boyd, P.A. law firm, which has offices at:

1201 Main Street, 22nd Floor

Street Address
Columbia

South Carolina

29201

City
803-779-3080

County

State

Zip Code

Telephone

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

N/A

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).

N/A

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 14 day of November, 2016.


APPLICANT

VERIFICATION

STATE OF District of Columbia

COUNTY OF WASHINGTON DC

I, Philip S. Goldbers, 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.

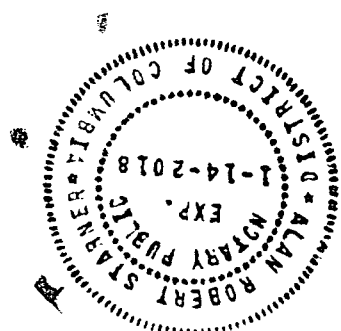
[Signature]
APPLICANT/AFFIANT

Subscribed and sworn to before me this 14 day of NOVEMBER, 2016.

[Signature]

Notary Public for the State of District of Columbia

ALAN ROBERT STARNER
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires January 14, 2018



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 November, 2016.

[Signature] STEVE A. MATTHEWS SC Bar 3689
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~~ ^{Hand delivery} 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 15th day of November, 2016.

[Signature]
APPLICANT/AFFIANT

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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

PHILIP SETH GOLDBERG

*was on **OCTOBER 4, 2004** 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 14, 2016.

JULIO A. CASTILLO
Clerk of the Court

By:

Verette Lane
Deputy Clerk