

STATE OF SOUTH CAROLINA
In the Supreme Court

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APPEAL FROM HORRY COUNTY
Court of General Sessions

S.C. SUPREME COURT

Larry B. Hyman, Circuit Court Judge

Appellate Case No. 2015-000731

STATE OF SOUTH CAROLINA *Respondent*

v.

LUZENSKI ALLEN COTTRELL *Appellant*

Motion for Admission *Pro Hac Vice*

KEIR M. WEYBLE
Cornell Law School
Myron Taylor Hall
Ithaca, NY 14853
607 255 3805

ROBERT M. DUDEK
Chief Appellate Defender
South Carolina Office of
Appellate Defense
P.O. Box 11589
Columbia, SC 29211
803 734 1330

Attorneys for Appellant

Motion For Admission *Pro Hac Vice*

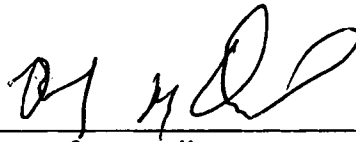
Appellant, Allen Luzinski Cottrell, by and through undersigned counsel, hereby moves this Court to admit Sheri Lynn Johnson, *pro hac vice*. Ms. Johnson meets the qualifications set forth by this Court, as detailed in the attached Application.

Respectfully submitted,

KEIR M. WEYBLE
Cornell Law School
Myron Taylor Hall
Ithaca, NY 14853
607 255 3805

ROBERT M. DUDEK
Chief Appellate Defender
South Carolina Office of
Appellate Defense
P.O. Box 11589
Columbia, SC 29211
803 734 1330

By:



Attorney for Appellant

December 6, 2016.

STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM HORRY COUNTY
Court of General Sessions

Larry B. Hyman, Circuit Court Judge

Appellate Case No. 2015-000731

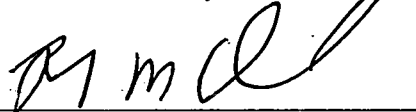
STATE OF SOUTH CAROLINA *Respondent*

v.

LUZENSKI ALLEN COTTRELL *Appellant*

CERTIFICATE OF SERVICE

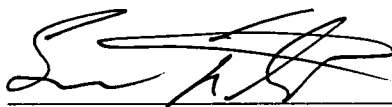
The undersigned attorney hereby certifies that a true copy of the Motion for Admission *Pro Hac Vice* in the above-captioned case has been served upon Donald J. Zelenka, Senior Assistant Deputy Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Rm. 519, Columbia, SC 29201, this 6th day of December, 2016.



Robert M. Dudek
Chief Appellate Defender

Attorney for Appellant

SWORN TO BEFORE ME this 6th day
of December, 2016.



(L. S.)

Notary Public for South Carolina

My Commission Expires: October 30, 2022.

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

State of South Carolina	Case No.	Supreme Court of South Carolina
Plaintiff		Tribunal
vs.		
	Mailing Address of Tribunal:	Supreme Court of South Carolina
Luzenski Allen Cottrell		P.O. Box 11330
Defendant		Columbia, SC 29211

Comes now Sheri Lynn Johnson, applicant herein, and respectfully represents the following:

1. Applicant resides at:

203 The Parkway
Street Address

Ithaca	Tompkins	NY	14850
City	County	State	Zip Code
607 227 1304			

Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Cornell, with offices at 240 Myron Taylor Hall

Street Address

Ithaca	Tompkins	NY	14853
City	County	State	Zip Code
607 255 6478	607 227 1304	607 255 7193	slj8@cornell.edu

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 _____ 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 16 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 New York 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:
United States Supreme Court	July 16, 1984

Court:	Date Admitted:
United States Court of Appeals for the Fifth Circuit	March 23, 2012
United States Court of Appeals for the Fourth Circuit	April 9, 1996
United States District Court, Western District of New York	April 28, 2006
United States District Court, Southern District of New York	March 28, 1982

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

9. Local counsel of record associated with applicant in this case is Robert M. Dudek of the Division of Appellate Defense law firm, which has offices at:

P.O. Box 11589

<u>Street Address</u>	<u>Richland</u>	<u>SC</u>	<u>29211</u>
<u>Columbia</u>	<u>County</u>	<u>State</u>	<u>Zip Code</u>
<u>803 734 1330</u>	<u>803-719-6633</u>	<u>803-734-1397</u>	<u>RDudek@SCCID.SC.gov</u>
<u>Primary Telephone</u>	<u>Cell Phone</u>	<u>Fax Number</u>	<u>Email Address</u>
<u>#1767</u>			

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).

State v. Keith Simpson, granted 2004, appeal from state post-conviction proceedings, conviction reversed); State v. James Wilson (granted 1993, post-conviction proceedings, relief denied); State v. Shanan Ardis (granted 1996, trial, sentenced to life imprisonment), State v. Sterling Spann (granted 2002, guilty plea)

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 8th day of November, 2016


APPLICANT

VERIFICATION

STATE OF New York)

COUNTY OF Tompkins)

I, Sheri Lynn Johnson, 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.

Sheri Lynn Johnson
APPLICANT/AFFIANT

Subscribed and sworn to before me this 30th day of November, 20 16

Erica J Russell

ERICA J. RUSSELL
Notary Public - State of New York
No. 01RU6287379
Qualified in Chemung County
My Commission Expires August 05, 2017

Notary Public for the State of New York

My Commission Expires: August 5, 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 10th day of November, 20 16

RS M. Owl
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

30th day of November, 20 16

Sheri Lynn Johnson
APPLICANT/AFFIANT

Appellate Division of the Supreme Court
of the State of New York
First Judicial Department

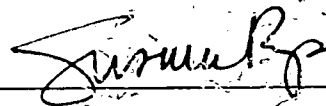
I, Susanna Rojas, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, certify that

SHERI LYNN JOHNSON

was duly licensed and admitted to practice as an Attorney and Counsellor at Law in all the courts of the State of New York on June 16, 1980, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counsellors at Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an attorney and counsellor at law.

In Witness Whereof, I have hereunto set my hand and affixed the seal of this court on

October 27, 2016



Clerk of the Court



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