

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

APPEAL FROM RICHLAND COUNTY
In the Court of Common Pleas

G. Thomas Cooper, Jr., Presiding Judge

Appellate Case No. 2014-001115

RECEIVED

JUL 14 2014

SC Court of Appeals

Kristin Joseph P.T., Thomas N. Joseph, M.D.,
and William G. McCarthy, M.D.,.....Appellants,

v.

South Carolina Department of Labor, Licensing
and Regulation, South Carolina Board of Physical
Therapy,.....Respondents,

and

South Carolina Chapter, American Physical
Therapy Association, Joseph M. McKowen, P.T.,
Sabrina Queen Bridges, PTA, and Amalia W. Kirby, PTA,.....Respondents.

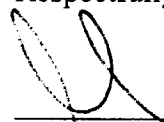
MOTION FOR ADMISSION TO PRACTICE PRO HAC VICE

Pursuant to Rule 404 SCACR, Respondent South Carolina Chapter, American Physical Therapy Association by and through its undersigned counsel, moves for admission of N. Thomas Connally, III, and Marques P. Richeson, to practice *pro hac vice* before this Court. This motion is made on the grounds that a Consent Order for Admission to Practice Pro Hac Vice for N. Thomas Connally, III, was signed by the Honorable L. Casey Manning on November 19, 2013, and filed in the Richland County Court of Common Pleas on November 21, 2013 (Exhibit A). A Consent Order for

Admission To Practice Pro Hac Vice for Marques P. Richeson was signed by the Honorable L. Casey Manning on November 13, 2013, and filed in the Richland County Court of Common Pleas on November 21, 2013 (Exhibit B). Respondent South Carolina Chapter, American Physical Therapy Association respectfully requests that Attorneys Connally and Richeson be admitted pro hac vice before this Court in the above-referenced matter.

Respectfully submitted,

By: _____



S. Jahue Moore
John C. Bradley, Jr.
MOORE TAYLOR LAW FIRM, PA
1700 Sunset Boulevard
West Columbia, SC 29169
803-796-9160
803-791-8410 (Fax)
john@mttlaw.com

*Counsel for Respondent South Carolina
Chapter, American Physical Therapy
Association*

West Columbia, SC
July 11, 2014

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NUMBER: 2012CP4002632

Kristin Joseph

SC Dept Of Labor Licensing And Regulation

Thomas N Joseph

South Carolina Board of Physical Therapy

PLAINTIFF(S)

DEFENDANT(S)

Submitted by: _____

Attorney for : Plaintiff Defendant or Self-Represented Litigant

DISPOSITION TYPE (CHECK ONE)

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED (CHECK REASON):** Rule 12(b), SCRPC; Rule 41(a), SCRPC (Vol. Nonsuit); Rule 43(k), SCRPC (Settled); Other _____
- ACTION STRICKEN (CHECK REASON):** Rule 40(j), SCRPC; Bankruptcy; Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; Other _____
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):** Affirmed; Reversed; Remanded; Other _____

JEANETTE W. McBRIDE
2013 NOV 21 AM 11:24
RICHLAND COUNTY
FILED

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: See attached order (formal order to follow) Statement of Judgment by the Court:

ORDER INFORMATION

This order ends does not end the case.

Additional Information for the Clerk :

INFORMATION FOR THE PUBLIC INDEX

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled
		\$
		\$
		\$

If applicable, describe the property, including tax map information and address, referenced in the order:

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time the form and final order are submitted to the judge may be provided to the clerk. Note: Title abstractors and researchers should refer to the official court order for judgment details.

Circuit Court Judge _____ Judge Code _____ Date _____

For Clerk of Court Office Use Only

This judgment was entered on the _____ day of _____, 20____ and a copy mailed first class or placed in the appropriate attorney's box on this 21 November 2013 to attorneys of record or to parties (when appearing pro se) as follows:

Mary Elizabeth (Liz) Crum

Monteith Powell Todd
Emily Whitney Medlyn

S. Jahue Moore

ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

Court Reporter

Clerk of Court

Jeanette W. McBride

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

IN THE COURT OF COMMON PLEAS
FIFTH JUDICIAL CIRCUIT

Kristin Joseph, PT, Thomas N. Joseph, MD,)
and William G. McCarthy, MD,)
)
Plaintiffs,)

Civil Action No. 12-CP-40-2632

v.)

**CONSENT ORDER FOR ADMISSION
TO PRACTICE PRO HAC VICE**

South Carolina Department of Labor,)
Licensing and Regulation, South)
Carolina Board of Physical Therapy,)
)
Defendant,)

and)

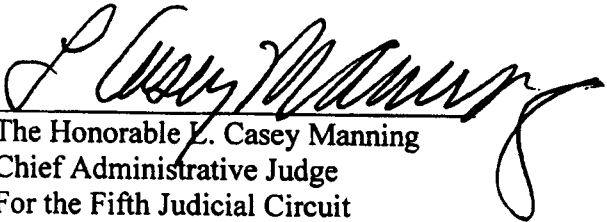
South Carolina Chapter, American Physical)
Therapy Association, Joseph M. McKowen,)
PT, Sabrina Queen Bridges, PTA, and)
Amalia W. Kirby, PTA,)
)
Defendant-Intervenors)

RICHLAND COUNTY
FILED
2013 NOV 21 AM 11:23
JEANETTE W. YOUNG
C.C.P. & G.S.

This matter is before the Court by counsel for the Defendant-Intervenors, by and with the consent of counsel for the Plaintiffs and Defendant, for admission of N. Thomas Connally, III, to practice *pro hac vice* before this Court. It appears to this Court that N. Thomas Connally, III, has filed a properly completed Verified Application for Admission *pro hac vice* with this Court (attached hereto as Exhibit A) and with the South Carolina Supreme Court Office of Bar Admissions. It further appears to the Court that the applicant has paid all applicable fees.

Now therefore, it is the order of this Court that N. Thomas Connally, III, be admitted *pro hac vice* to practice before this Court for the case above referenced.

AND IT IS SO ORDERED.


The Honorable L. Casey Manning
Chief Administrative Judge
For the Fifth Judicial Circuit

Columbia, South Carolina

November 19, 2013

WE SO MOVE:



S. Jahue Moore
John C. Bradley, Jr.
Moore, Taylor & Thomas, P. A.
P. O. Box 5709
West Columbia, S. C. 29171
803-796-9160
Attorney for Defendant-Intervenor SC Chapter,
American Physical Therapy Association

WE CONSENT:

M. Elizabeth Crum
McNair Law Firm, P. A.
P. O. Box 11390
Columbia, S. C. 29211
803-799-9800
Attorney for Plaintiffs

SI
Monteith P. Todd
Sowell Gray Stepp & Laffitte, LLC
P. O. Box 11449
Columbia, S. C. 29211
803-231-7837
Attorney for Defendant SC Department of
Labor, Licensing and Regulation, SC
Board of Physical Therapy

Emily W. Medlyn
Devlin & Parkinson
P. O. Box 10387
Greenville, SC 29603-0387
864-242-4050
Attorney for Defendant-Intervenors Joseph
M. McKowen, PT, Sabrina Queen
Bridges, PTA and Amalia W. Kirby, PTA


AND IT IS SO ORDERED.

The Honorable L. Casey Manning
Chief Administrative Judge
For the Fifth Judicial Circuit

Columbia, South Carolina

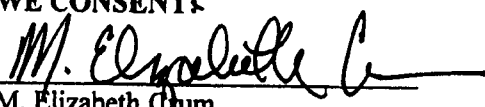
November ____, 2013

WE SO MOVE:



S. Jahue Moore
John C. Bradley, Jr.
Moore, Taylor & Thomas, P. A.
P. O. Box 5709
West Columbia, S. C. 29171
803-796-9160
Attorney for Defendant-Intervenor SC Chapter,
American Physical Therapy Association

WE CONSENT:



M. Elizabeth Crum
McNair Law Firm, P. A.
P. O. Box 11390
Columbia, S. C. 29211
803-799-9800
Attorney for Plaintiffs

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864-242-4050
Attorney for Defendant-Intervenors Joseph
M. McKowen, PT, Sabrina Queen
Bridges, PTA and Amalia W. Kirby, PTA


AND IT IS SO ORDERED.

The Honorable L. Casey Manning
Chief Administrative Judge
For the Fifth Judicial Circuit

Columbia, South Carolina

November _____, 2013

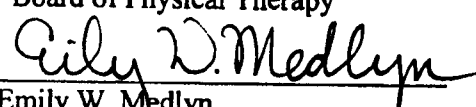
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John C. Bradley, Jr.
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West Columbia, S. C. 29171
803-796-9160
Attorney for Defendant-Intervenor SC Chapter,
American Physical Therapy Association

WE CONSENT:

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Attorney for Plaintiffs

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Attorney for Defendant SC Department of
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Greenville, SC 29603-0387
864-242-4050
Attorney for Defendant-Intervenors Joseph
M. McKowen, PT, Sabrina Queen
Bridges, PTA and Amalia W. Kirby, PTA

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

Kristin Joseph, PT, Thomas N. Joseph,
MD, and William G. McCarthy, MD
Plaintiff

Civil Action No. 12-CP-40-2632

Court of Common Pleas,
Richland County
Court

vs.

Case No.

South Carolina Department of Labor,
Licensing and Regulation, South Carolina
Board of Physical Therapy; South Carolina
Chapter, American Physical Therapy
Association; Joseph M. McKowen, PT;
Sabrina Queen Bridges, PTA; and Amalia
W. Kirby, PTA
Defendant

Mailing Address of Court: 1701 Main Street, Columbia, S.C.
29202

2013 NOV -4 PM 3:24
RICHLAND COUNTY
FILED
JEANETTE W. HERRIDGE
C.C.P. & G.S.

Comes now N. Thomas Connally, III, applicant herein, and respectfully represents the following:

1. Applicant resides at:

3510 Roberts Lane

Street Address

Arlington

City

703-351-8196

Telephone

Arlington

County

VA

State

22207

Zip Code

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

Lovells US LLP, with offices at, at
7930 Jones Branch Drive, Ninth Floor

Street Address

McLean

City

703-610-6100

Telephone

Fairfax

County

VA

State

703-610-6200

Fax Number

22102

Zip Code

3. Applicant has been retained personally or as a member of the above named law firm by South Carolina Chapter, American Physical Therapy 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 November of 1993, 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 Virginia 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:
U.S. District Court for the Eastern District of Virginia	December 10, 1993
U.S. District Court for the Western District of Virginia	January 14, 2005
U.S. District Court for the District of Columbia	November 3, 1997
U.S. Court of Appeals for the Fourth Circuit	April 19, 2002
U.S. Court of Appeals for the Ninth Circuit	October 28, 2011

U.S. Court of Appeals for the Tenth Circuit	June 29, 2001
U.S. Court of Appeals for the Eleventh Circuit	July 9, 2007
U.S. Court of Appeals for the District of Columbia Circuit	April 14, 1998
U.S. Supreme Court	February 19, 2008

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

9. Local counsel of record associated with applicant in this case is John C. Bradley, Jr., of the Moore, Taylor & Thomas, P.A. law firm, which has offices at:

1700 Sunset Boulevard

Street Address

Lexington

County

803-796-9160

Telephone

West Columbia

City

SC

State

29169

Zip Code

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

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).

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 25th day of October, 2013.

[Signature]
APPLICANT

STATE OF Va
COUNTY OF Fairfax

VERIFICATION

I, N. Thomas Connally, III, 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.

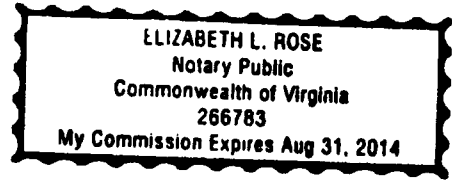
[Signature]
APPLICANT/AFFIANT

Subscribed and sworn to before me this 28th day of October, 2013.

[Signature]

Notary Public for the State of Va

My Commission Expires: 8-31-14



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 _____ day of October, 2013.

[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 28th day of October, 2013.

Number JCBj

[Signature]
APPLICANT/AFFIANT

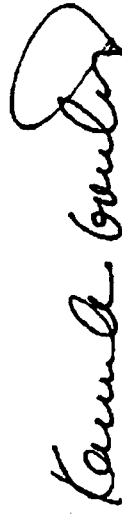
4th Jg.

VIRGINIA STATE BAR

CERTIFICATE OF GOOD STANDING

THIS IS TO CERTIFY THAT NATHANIEL THOMAS CONNALLY, III IS AN ACTIVE MEMBER OF THE VIRGINIA STATE BAR IN GOOD STANDING. MR. CONNALLY WAS LICENSED TO PRACTICE LAW IN VIRGINIA ON OCTOBER 15, 1993, AFTER SUCCESSFULLY PASSING THE BAR EXAMINATION GIVEN BY THE VIRGINIA BOARD OF BAR EXAMINERS.

Issued October 24, 2013



KAREN A. GOULD
EXECUTIVE DIRECTOR AND
CHIEF OPERATING OFFICER

HOGAN LOVELLS US LLP
NORTHERN VA DISBURSEMENT
7930 JONES BRANCH DRIVE, 9TH FLOOR
MC LEAN, VA 22102

Wachovia Bank,
a division of Wells Fargo Bank, N.A.
68-54/514

5232

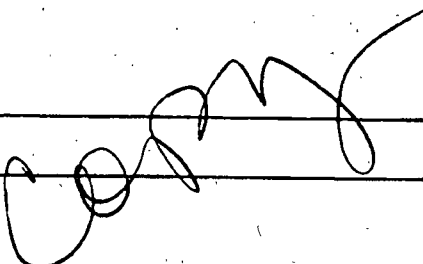
10/25/2013

PAY TO THE ORDER OF South Carolina Supreme Court

\$ **250.00

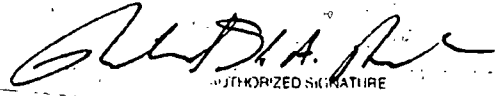
Two Hundred Fifty Only*****

DOLLARS



MEMO

Filing Fee (57955.0028)



AUTHORIZED SIGNATURE

HOGAN LOVELLS US LLP NORTHERN VA DISBURSEMENT

5232

HOGAN LOVELLS US LLP NORTHERN VA DISBURSEMENT

5232

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NUMBER: 2012CP4002632

Kristin Joseph

SC Dept Of Labor Licensing And Regulation

Thomas N Joseph

South Carolina Board of Physical Therapy

PLAINTIFF(S)

DEFENDANT(S)

Submitted by: _____

Attorney for : Plaintiff Defendant or Self-Represented Litigant

DISPOSITION TYPE (CHECK ONE)

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED (CHECK REASON):** Rule 12(b), SCRPC; Rule 41(a), SCRPC (Vol Nonsuit); Rule 43(k), SCRPC (Settled); Other _____
- ACTION STRICKEN (CHECK REASON):** Rule 40(j), SCRPC; Bankruptcy; Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; Other _____
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):** Affirmed; Reversed; Remanded; Other _____

RICHLAND COUNTY
FILED
2013 NOV 24 AM 11:24
JEANETTE W. BRIDE
CLERK OF COURT

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: See attached order (formal order to follow) Statement of Judgment by the Court:

ORDER INFORMATION

This order ends does not end the case.

Additional Information for the Clerk : _____

INFORMATION FOR THE PUBLIC INDEX

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled
		\$
		\$
		\$

If applicable, describe the property, including tax map information and address, referenced in the order: _____

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time the form and final order are submitted to the judge may be provided to the clerk. Note: Title abstractors and researchers should refer to the official court order for judgment details.

Circuit Court Judge _____ Judge Code _____ Date _____

For Clerk of Court Office Use Only

This judgment was entered on the _____ day of _____, 20____ and a copy mailed first class or placed in the appropriate attorney's box on this 21 November 2013 to attorneys of record or to parties (when appearing pro se) as follows:

Mary Elizabeth (Liz) Crum

Monteith Powell Todd
Emily Whitney Medlyn

S. Jahue Moore

ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

Court Reporter _____

Clerk of Court

Jeanette W. Bride

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

IN THE COURT OF COMMON PLEAS
FIFTH JUDICIAL CIRCUIT

Kristin Joseph, PT, Thomas N. Joseph, MD,)
and William G. McCarthy, MD,)
)
Plaintiffs,)

Civil Action No. 12-CP-40-2632

v.)

**CONSENT ORDER FOR ADMISSION
TO PRACTICE PRO HAC VICE**

South Carolina Department of Labor,)
Licensing and Regulation, South)
Carolina Board of Physical Therapy,)
)
Defendant,)

and)

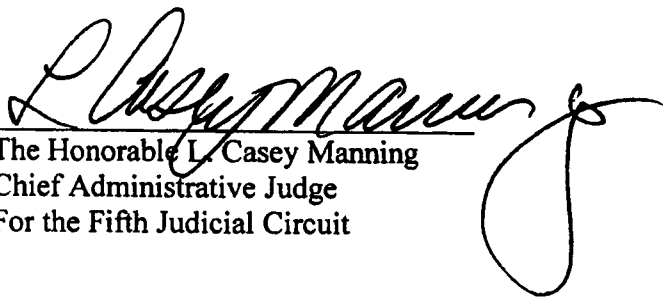
South Carolina Chapter, American Physical)
Therapy Association, Joseph M. McKowen,)
PT, Sabrina Queen Bridges, PTA, and)
Amalia W. Kirby, PTA,)
)
Defendant-Intervenors)

RICHLAND COUNTY
FILED
2013 NOV 21 AM 11:23
JEANETTE W. BRIDGE
C.C.P. # 2 G.S.

This matter is before the Court by counsel for the Defendant-Intervenors, by and with the consent of counsel for the Plaintiffs and Defendant, for admission of Marques P. Richeson, to practice *pro hac vice* before this Court. It appears to this Court that Marques P. Richeson, has filed a properly completed Verified Application for Admission *pro hac vice* with this Court (attached hereto as Exhibit A) and with the South Carolina Supreme Court Office of Bar Admissions. It further appears to the Court that the applicant has paid all applicable fees.

Now therefore, it is the order of this Court that Marques P. Richeson, be admitted *pro hac vice* to practice before this Court for the case above referenced.


AND IT IS SO ORDERED.


The Honorable L. Casey Manning
Chief Administrative Judge
For the Fifth Judicial Circuit

Columbia, South Carolina

November 13, 2013


WE SO MOVE:



S. Jahue Moore
John C. Bradley, Jr.
Moore, Taylor & Thomas, P. A.
P. O. Box 5709
West Columbia, S. C. 29171
803-796-9160
Attorney for Defendant-Intervenor SC Chapter,
American Physical Therapy Association

WE CONSENT:

M. Elizabeth Crum
McNair Law Firm, P. A.
P. O. Box 11390
Columbia, S. C. 29211
803-799-9800
Attorney for Plaintiffs



Monteith P. Todd
Sowell Gray Stepp & Laffitte, LLC
P. O. Box 11449
Columbia, S. C. 29211
803-231-7837
Attorney for Defendant SC Department of
Labor, Licensing and Regulation, SC
Board of Physical Therapy

Emily W. Medlyn
Devlin & Parkinson
P. O. Box 10387
Greenville, SC 29603-0387
864-242-4050
Attorney for Defendant-Intervenors Joseph
M. McKowen, PT, Sabrina Queen
Bridges, PTA and Amalia W. Kirby, PTA

AND IT IS SO ORDERED.

The Honorable L. Casey Manning
Chief Administrative Judge
For the Fifth Judicial Circuit

Columbia, South Carolina

November ____, 2013

WE SO MOVE:



S. Jahue Moore
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P. O. Box 5709
West Columbia, S. C. 29171
803-796-9160
Attorney for Defendant-Intervenor SC Chapter,
American Physical Therapy Association

WE CONSENT:



M. Elizabeth Crum
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P. O. Box 11390
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Attorney for Defendant SC Department of
Labor, Licensing and Regulation, SC
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864-242-4050
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M. McKowen, PT, Sabrina Queen
Bridges, PTA and Amalia W. Kirby, PTA

AND IT IS SO ORDERED.

The Honorable L. Casey Manning
Chief Administrative Judge
For the Fifth Judicial Circuit

Columbia, South Carolina

November _____, 2013

WE SO MOVE:

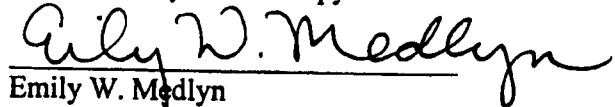


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WE CONSENT:

M. Elizabeth Crum
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Attorney for Defendant SC Department of
Labor, Licensing and Regulation, SC
Board of Physical Therapy



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864-242-4050
Attorney for Defendant-Intervenors Joseph
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Bridges, PTA and Amalia W. Kirby, PTA

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

Kristin Joseph, PT, Thomas N. Joseph,
MD, and William G. McCarthy, MD

Plaintiff

Civil Action No. 12-CP-40-2632

Case No.

Court of Common Pleas,
Richland County

Court

vs.

South Carolina Department of Labor,
Licensing and Regulation, South Carolina
Board of Physical Therapy; South Carolina
Chapter, American Physical Therapy
Association; Joseph M. McKowen, PT;
Sabrina Queen Bridges, PTA; and Amalia
W. Kirby, PTA

Defendant

Mailing Address of Court: 1701 Main Street, Columbia, S.C.
29202

FILED
2013 NOV -4 PM 3:24
JEANETTE W. HARRISON
C.C.P. & G.S.

Comes now Marques P. Richeson, applicant herein, and respectfully represents the following:

1. Applicant resides at:

10255 Chinkapin Drive

Street Address

Manassas

City

703-593-0622

Telephone

Prince William

County

VA

State

20111

Zip Code

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

Lovells US LLP, with offices at, at
7930 Jones Branch Drive, Ninth Floor

Street Address

McLean

City

703-610-6100

Telephone

Fairfax

County

VA

State

703-610-6200

Fax Number

22102

Zip Code

3. Applicant has been retained personally or as a member of the above named law firm by South Carolina Chapter, American Physical Therapy 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 16 of 2008, 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 Virginia 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:

U.S. District Court for the Eastern District of Virginia	December 3, 2009
U.S. Court of Appeals for the Fourth Circuit	July 27, 2009
District of Columbia	August 10, 2009

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

9. Local counsel of record associated with applicant in this case is John C. Bradley, Jr., of the Moore, Taylor & Thomas, P.A. law firm, which has offices at:

1700 Sunset Boulevard

Street Address

Lexington

County

803-796-9160

Telephone

West Columbia

City

SC

State

29169

Zip Code

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

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).

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 1st day of November, 2013.

Mr. P.R.
APPLICANT

STATE OF va
COUNTY OF Fairfax

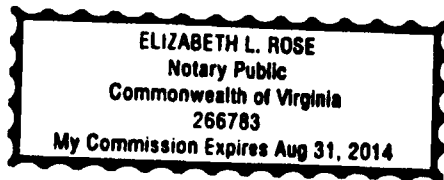
VERIFICATION

I, Marques P. Richeson, 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.

Mr. P.R.
APPLICANT/AFFIANT

Subscribed and sworn to before me this 1st day of November, 2013.

Elizabeth L. Rose
Notary Public for the State of va



My Commission Expires: 8.31.14

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 4 day of November, 2013.

[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 4th day of November, 2013.

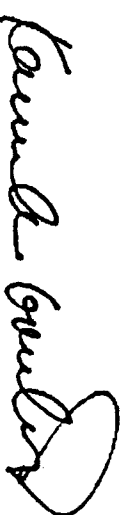
Mr. P.R.
APPLICANT/AFFIANT

VIRGINIA STATE BAR

CERTIFICATE OF GOOD STANDING

THIS IS TO CERTIFY THAT MARQUES PAIGE DORIAN RICHESON IS AN ACTIVE MEMBER OF THE VIRGINIA STATE BAR IN GOOD STANDING. MR. RICHESON WAS LICENSED TO PRACTICE LAW IN VIRGINIA ON OCTOBER 16, 2008, AFTER SUCCESSFULLY PASSING THE BAR EXAMINATION GIVEN BY THE VIRGINIA BOARD OF BAR EXAMINERS.

Issued October 28, 2013



KAREN A. GOULD
EXECUTIVE DIRECTOR AND
CHIEF OPERATING OFFICER

HOGAN LOVELLS US LLP
NORTHERN VA DISBURSEMENT
7930 JONES BRANCH DRIVE, 9TH FLOOR
MC LEAN, VA 22102

Wachovia Bank,
a division of Wells Fargo Bank, N.A.
68-54/514

5240

11/1/2013

PAY TO THE ORDER OF South Carolina Supreme Court

\$ **250.00

Two Hundred Fifty Only*****

DOLLARS

COPY

MEMO

Filing fee - pro hac M. Richeson (57955.0028)

[Handwritten Signature]
AUTHORIZED SIGNATURE

HOGAN LOVELLS US LLP NORTHERN VA DISBURSEMENT

5240

HOGAN LOVELLS US LLP NORTHERN VA DISBURSEMENT

5240

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

APPEAL FROM RICHLAND COUNTY
In the Court of Common Pleas

G. Thomas Cooper, Jr., Presiding Judge

Appellate Case No. 2014-001115

Kristin Joseph P.T., Thomas N. Joseph, M.D.,
and William G. McCarthy, M.D.,.....Appellants,

v.

South Carolina Department of Labor, Licensing
and Regulation, South Carolina Board of Physical
Therapy,.....Respondents,

and

South Carolina Chapter, American Physical
Therapy Association, Joseph M. McKowen, P.T.,
Sabrina Queen Bridges, PTA, and Amalia W. Kirby, PTA.....Respondents.

PROOF OF SERVICE

I, Lynn G. Ivey, an employee of Moore Taylor Law Firm, P.A., certify that I have on this day effected service of the below-listed document(s) upon below-listed counsel, by placing a copy of same in the United States mail in an envelope with sufficient postage affixed thereto, and by electronic mail transmission, addressed as listed below.

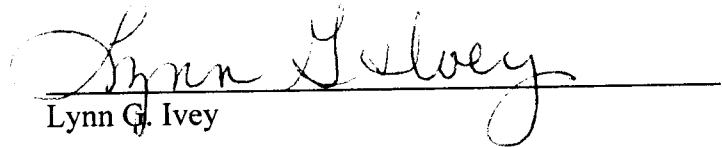
M. Elizabeth Crum
Ariel Kirk
McNair Law Firm, P.A.
P.O. Box 11390
Columbia, SC 29211
lcum@mcnair.net
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Monteith P. Todd
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mtodd@sowellgray.com

John R. Devlin, Jr.
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Greenville, SC 29603-0387
john.devlin@devlinparkinson.com

Sara McCartha
Darra Coleman
Office of Advice Counsel
SC Department of Labor, Licensing
& Regulation
110 Centerview Drive
Columbia, SC 29211
sara.mccartha@llr.sc.gov
darra.coleman@llr.sc.gov

DOCUMENT(S): 1. Motion for Admission to Practice Pro Hac Vice


Lynn G. Ivey

West Columbia, South Carolina
July 11, 2014

MT MOORE TAYLOR

July 11, 2014

The Honorable Daniel E. Shearouse
Clerk of Court
Supreme Court of South Carolina
P. O. Box 11330
Columbia, SC 29211
VIA HAND DELIVERY

RE: Kristin Joseph, P.T., Thomas N. Joseph M.D., and William G. McCarthy, M.D., v. South Carolina Department of Labor, Licensing and Regulation, South Carolina Board of Physical Therapy, and South Carolina Chapter, American Physical Therapy Association, Joseph M. McKowen, P.T., Sabrina Queen Bridges, PTA, and Amalia W. Kirby, PTA
Appellate Case No. 2014-001115

Dear Mr. Shearouse:

Please find enclosed for filing the original and nine copies of Respondent South Carolina Chapter, American Physical Therapy Association's Motion for Admission to Practice Pro Hac Vice as instructed by Debbie in your office. We would appreciate your filing the original and six copies and returning the file-stamped copies to our courier.

By copy of this letter to all counsel of record, we are hereby serving them with copies of the same.

Should you have any questions, please do not hesitate to contact our office.

Sincerely,

John C. Bradley, Jr.

Enclosures

cc: M. Elizabeth Crum, Esquire (via mail and email)
Ariel Kirk, Esquire (via mail and email)
Sara McCartha, Esquire (via mail and email)
Darra Coleman, Esquire (via mail and email)
Monteith P. Todd, Esquire (via mail and email)
N. Thomas Connally, III, Esquire (via email)
Marques Richeson, Esquire (via email)
John Devlin, Esquire (via mail and email)
Clerk of Court of Appeals (via mail)

RECEIVED

JUL 14 2014

SC Court of Appeals