

**IN THE  
THE SUPREME COURT OF SOUTH CAROLINA  
ON A CERTIFIED QUESTION**

Theodore G. Hartsock, Jr., as Personal Representative  
of the Estate of Sarah Mills Hartsock (Estate of  
Sarah Mill Harstock), Plaintiff-Appellee,

v.

Goodyear Dunlop Tires North America Ltd.,  
a foreign corporation; Goodyear Tire & Rubber Company,  
a foreign corporation, Defendants-Appellants.

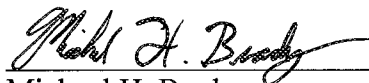
Appellate Case No. 2016-002398

**MOTION OF MICHAEL HUGH BRADY FOR  
ADMISSION PRO HAC VICE PURSUANT TO RULE 244(d)**

The undersigned applicant is counsel to the Defendants-Appellants in the certifying court who is admitted and authorized to practice law in the highest court of Virginia, but is not licensed to practice law in South Carolina, and who desires to participate in the proceedings in this matter before the Supreme Court. This Motion is supported by the memorandum with citation of authorities in support as required by Rule 240(c)(2), SCACR. The certificate of service required by Rule 240(c)(1), SCACR is being filed concurrently with the Motion, as is the application and certificate of good standing required by Rule 404(a), SCACR.

March 17, 2017

Respectfully Submitted,



Michael H. Brady  
McGUIREWOODS LLP  
800 East Canal Street  
Richmond, Virginia 23219  
(804) 775-4327

*Attorney for Defendants – Appellants*

**RECEIVED**

MAR 20 2017

**S.C. SUPREME COURT**

**IN THE  
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Theodore G. Hartsock, Jr., as Personal Representative  
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v.

Goodyear Dunlop Tires North America Ltd.,  
a foreign corporation; Goodyear Tire & Rubber Company,  
a foreign corporation, Defendants-Appellants.


Appellate Case No. 2016-002398

**MEMORANDUM WITH CITATION OF AUTHORITIES IN SUPPORT OF THE  
MOTION OF MICHAEL HUGH BRADY FOR  
ADMISSION PRO HAC VICE PURSUANT TO RULE 244(d)**

The undersigned applicant for admission pro hac vice is a counsel of record representing the Defendants-Appellants in the certifying court who is admitted and authorized to practice law in the highest court of Virginia, but who is not licensed to practice law in South Carolina. The Applicant desires to participate in the proceedings before this Court. Rule 244(d), SCACR permits such persons to apply for admission pro hac vice within fifteen (15) days from the date of the order from this Court agreeing to answer a certified question. The Order in this case accepting the certified question is dated March 3, 2017. Because this Motion has been timely filed and served and is properly supported by the application required by Rule 404, SCACR, it should be granted.

March 17, 2017

Respectfully Submitted,

  
\_\_\_\_\_  
Michael H. Brady  
McGUIREWOODS LLP  
800 East Canal Street  
Richmond, Virginia 23219

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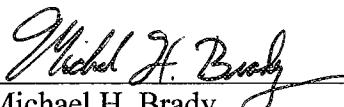
MAR 20 2017

(804) 775-4327

*Attorney for Defendants -- Appellants*

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 17th day of March, 2017, I caused to be filed with the clerk of the Supreme Court of South Carolina an original and six copies of the foregoing Motion of Michael H. Brady for Admission Pro Hac Vice and Memorandum with Citation of Authorities in Support thereof required by Rule 240(c)(2), SCACR, as well as an original of the Application for Admission Pro Hac Vice of Michael H. Brady, supported by a certificate of good standing from the Supreme Court of Virginia, all as required by Rule 404, SCACR and as referenced in the Motion and Memorandum. On the same day, I also caused a copy of each of the foregoing to be served upon Plaintiff-Appellee by depositing a copy of the same in the United States Mail, first-class postage prepaid, addressed to his attorneys of record, Mark C. Tanenbaum and Mia Lauren Maness at MARK C. TANENBAUM, P.A., P. O. Box 20757, 120 Church Street, Charleston, South Carolina 29401, in accordance with Rule 262, SCACR.

  
\_\_\_\_\_  
Michael H. Brady  
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Richmond, Virginia 23219  
(804) 775-4327

*Attorney for Defendants – Appellants*

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