

**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
a Foreign corporation; Goodyear Tire & Rubber
Company, a Foreign Corporation, Defendants –Appellants.

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MAR 17 2017

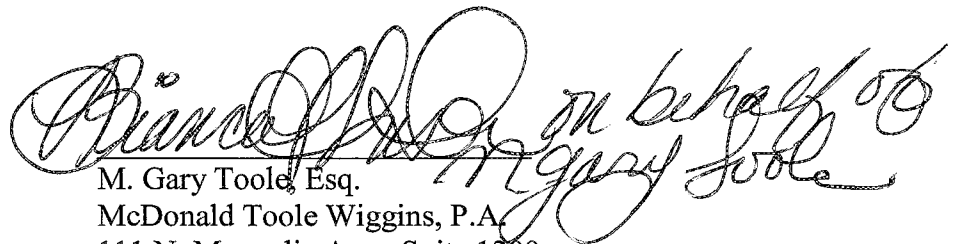
S.C. SUPREME COURT

Appellate Case No. 2016-002398

**MOTION OF M. GARY TOOLE FOR
ADMISSION PRO HAC VICE PURSUANT TO RULE 244(d)**

The undersigned applicant is a counsel of record for the Defendant-Appellants in the certifying court who is not licensed to practice law in South Carolina, but 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 required by Rule 404(a), SCACR.

March 16, 2017

A handwritten signature in cursive script, appearing to read "M. Gary Toole on behalf of", is written over a horizontal line. The signature is written in black ink and is somewhat stylized.

M. Gary Toole, Esq.
McDonald Toole Wiggins, P.A.
111 N. Magnolia Ave., Suite 1200
Orlando, FL 32801
(407) 246-1800
Attorney for Defendants - Appellant

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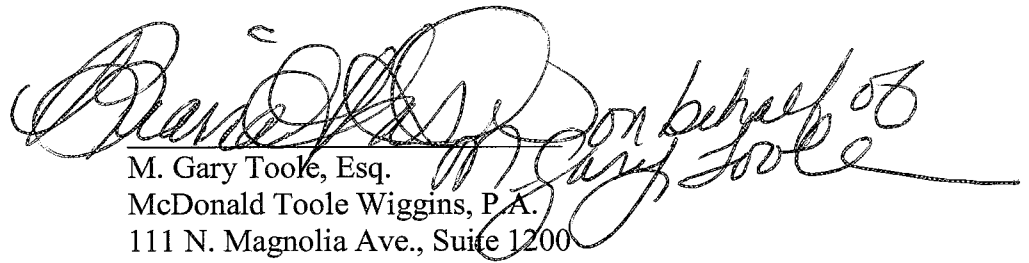
S.C. SUPREME COURT

Appellate Case No. 2016-002398

**MEMORANDUM WITH CITATION OF AUTHORITIES IN SUPPORT OF THE
MOTION OF M. GARY TOOLE FOR
ADMISSION PRO HAC VICE PURSUANT TO RULE 244(d)**

The Applicant for admission pro hac vice is a counsel of record representing the Defendants-Appellants in the certifying court 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 16, 2017


M. Gary Toole, Esq.
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111 N. Magnolia Ave., Suite 1200
Orlando, FL 32801
(407) 246-1800
Attorney for Defendants - Appellant

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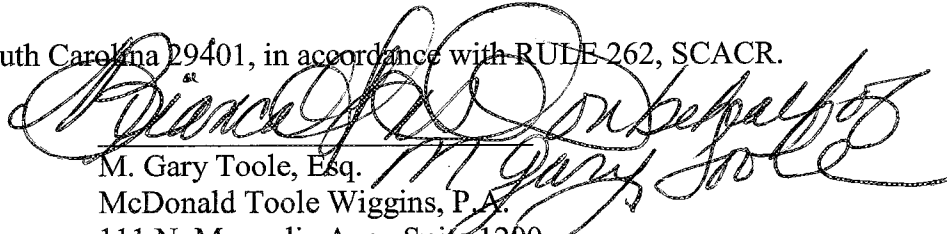
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CERTIFICATE OF SERVICE

I certify that on this the 16th day of March, 2017, I caused to be filed with the Clerk of the Supreme Court of South Carolina the original and six copies of the Motion of M. Gary Toole for Admission Pro Hac Vice, the Memorandum with Citation of Authorities in Support required by Rule 204(c)(2), SCACR, and the original of the Application for Admission Pro Hac Vice of M. Gary Toole that is required by Rule 404, SCACR. On the same day I 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.


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(407) 246-1800
Attorney for Defendants - Appellant