

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas
Diane Schafer Goodstein, Circuit Court Judge

Appellate Case No. 2015-000622

RECEIVED

SEP 01 2017

S.C. SUPREME COURT

The Protestant Episcopal Church in the Diocese of South Carolina; The Trustees of The Protestant Episcopal Church in South Carolina, a South Carolina Corporate Body; All Saints Protestant Episcopal Church, Inc.; Christ St. Paul's Episcopal Church; Christ the King, Waccamaw; Church of The Cross, Inc. and Church of the Cross Declaration of Trust; Church of The Holy Comforter; Church of the Redeemer; Holy Trinity Episcopal Church; Saint Luke's Church, Hilton Head; St. Matthews Church; St. Andrews Church-Mt. Pleasant Land Trust; St. Bartholomews Episcopal Church; St. David's Church; St. James' Church, James Island, S.C.; St. John's Episcopal Church of Florence, S.C.; St. Matthias Episcopal Church, Inc.; St. Paul's Episcopal Church of Bennettsville, Inc.; St. Paul's Episcopal Church of Conway; The Church of St. Luke and St. Paul, Radcliffeboro; The Church of Our Saviour of the Diocese of South Carolina; The Church of the Epiphany (Episcopal); The Church of the Good Shepherd, Charleston, SC; The Church of The Holy Cross; The Church of The Resurrection, Surfside; The Protestant Episcopal Church of The Parish of Saint Philip, in Charleston, in the State of South Carolina; The Protestant Episcopal Church, The Parish of Saint Michael, in Charleston, in the State of South Carolina and St. Michael's Church Declaration of Trust; The Vestry and Church Wardens of St. Jude's Church of Walterboro; The Vestry and Church Wardens of The Episcopal Church of The Parish of Prince George Winyah; The Vestry and Church Wardens of The Church of The Parish of St. Helena and The Parish Church of St. Helena Trust; The Vestry and Church Wardens of The Parish of St. Matthew; The Vestry and Wardens of St. Paul's Church, Summerville; Trinity Church of Myrtle Beach; Trinity Episcopal Church; Trinity Episcopal Church, Pinopolis; Vestry and Church Wardens of the Episcopal Church of The Parish of Christ Church; Vestry and Church Wardens

of The Episcopal Church of the Parish of St. John's,
Charleston County, The Vestries and Churchwardens of
The Parish of St. Andrews,,

Respondents,

v.

The Episcopal Church (a/k/a The Protestant Episcopal
Church in the United States of America) and The
Episcopal Church in South Carolina,.....

Appellants.

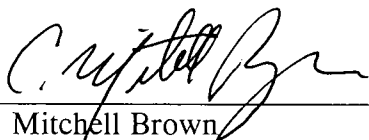
MOTION FOR ADMISSION PRO HAC VICE OF
CHARLES J. COOPER

Pursuant to Rule 404 of the South Carolina Appellate Court Rules, C. Mitchell Brown, a member in good standing of the South Carolina Bar, hereby moves this Court for an Order admitting Charles J. Cooper, Esquire to appear *pro hac vice* to practice before this Court for the sole purpose of appearing on behalf of The Protestant Episcopal Church in the Diocese of South Carolina and the Trustees of The Protestant Episcopal Church in South Carolina, a South Carolina Corporate Body in association with undersigned counsel in the above-captioned civil action.

In support of this Motion, the attached Verified Application for Admission *Pro Hac Vice* of Charles J. Cooper, Esquire, which is incorporated into this motion at Exhibit 1, sets forth his qualifications for admission *pro hac vice* and his agreement to abide by the ethical standards governing the practice of law in this Court.

SIGNATURE PAGE ATTACHED

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: 
C. Mitchell Brown
SC Bar No. 012872
Post Office Box 11070
Columbia, SC 29211
(803) 799-2000

*Attorneys for The Protestant Episcopal Church in the
Diocese of South Carolina and the Trustees
of The Protestant Episcopal Church in South Carolina,
a South Carolina Corporate Body*

Columbia, South Carolina

Sept. 1, 2017

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

The Protestant Episcopal Church in
the Diocese of South Carolina et al.

Plaintiff

2015-000622

Case No.

Supreme Court South Carolina

Tribunal

vs.

The Episcopal Church et al.

Defendant

Mailing Address of Tribunal:

Comes now Charles J. Cooper, applicant herein, and respectfully represents the following:

1. Applicant resides at:

7709 Carlton Place

Street Address

McLean

Fairfax

VA

22102

City

703-734-6834

County

State

Zip Code

Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Cooper & Kirk, PLLC, with offices at

1523 New Hampshire Avenue, N.W.

Street Address

Washington

D.C.

20036

City

202-220-9600

County

State

Zip Code

202-220-9601

cocooper@cooperkirk.com

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 The Protestant Episcopal Church in the Diocese of South Carolina 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 26th of January, 1979, 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 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:
See attachment	

Court:	Date Admitted:

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

N/A

9. Local counsel of record associated with applicant in this case is Mitch Brown
of the Nelson Mullins Riley & Scarborough law firm, which has offices at:

Meridian, 17th Floor, 1320 Main Street

Street Address	Richland	SC	29201
Columbia	County	State	Zip Code
City	Cell Phone	Fax Number	Email Address
803-255-5564	12872	803-256-7500	mitch.brown@nelsonmullins.com
Primary Telephone	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).

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 tribunal for this case only.

DATED this 31st day of August, 20 17



APPLICANT

VERIFICATION

District
STATE OF Columbia)
City
COUNTY OF Washington)

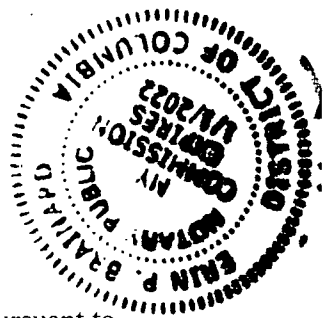
I, Charles J. Cooper, do hereby swear or affirm under penalty of perjury that I am the applicant in the above-styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and 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.

[Signature]
APPLICANT/AFFIANT

Subscribed and sworn to before me this 31st day of August, 20 17

Erin P. Brainard

Notary Public for the State of District of Columbia
My Commission Expires: 1/1/2022



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 1st day of September, 20 17

[Signature]
LOCAL COUNSEL OF RECORD

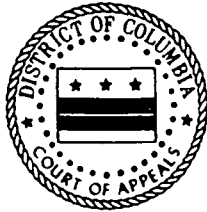
CERTIFICATE OF SERVICE

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 _____ day of _____, 20 _____

APPLICANT/AFFIANT

Attachment to Verified Application of Charles J. Cooper

State of Alabama	09/22/77
State of Georgia	11/13/79
District of Columbia	01/26/79
U.S. District Court for:	
District of Columbia	12/02/91
District of Colorado	02/17/15
U.S. Court of Appeals:	
First Circuit	11/24/04
Second Circuit	04/21/14
Third Circuit	09/25/92
Fourth Circuit	07/19/95
Fifth Circuit	01/11/83
Sixth Circuit	07/25/91
Seventh Circuit	10/13/00
Eighth Circuit	03/02/93
Ninth Circuit	02/14/96
Tenth Circuit	01/24/92
Eleventh Circuit	09/04/02
District of Columbia Circuit	06/22/83
Federal Circuit	08/17/92
U.S. Court of Federal Claims	01/12/90



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

CHARLES J. COOPER

was on JANUARY 26, 1979 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 AUGUST 31, 2017.

JULIO A. CASTILLO
Clerk of the Court

By: _____

Monette Lane
Deputy Clerk

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas
Diane Schafer Goodstein, Circuit Court Judge

Appellate Case No. 2015-000622

The Protestant Episcopal Church in the Diocese of South Carolina; The Trustees of The Protestant Episcopal Church in South Carolina, a South Carolina Corporate Body; All Saints Protestant Episcopal Church, Inc.; Christ St. Paul's Episcopal Church; Christ the King, Waccamaw; Church of The Cross, Inc. and Church of the Cross Declaration of Trust; Church of The Holy Comforter; Church of the Redeemer; Holy Trinity Episcopal Church; Saint Luke's Church, Hilton Head; St. Matthews Church; St. Andrews Church-Mt. Pleasant Land Trust; St. Bartholomews Episcopal Church; St. David's Church; St. James' Church, James Island, S.C.; St. John's Episcopal Church of Florence, S.C.; St. Matthias Episcopal Church, Inc.; St. Paul's Episcopal Church of Bennettsville, Inc.; St. Paul's Episcopal Church of Conway; The Church of St. Luke and St. Paul, Radcliffeboro; The Church of Our Saviour of the Diocese of South Carolina; The Church of the Epiphany (Episcopal); The Church of the Good Shepherd, Charleston, SC; The Church of The Holy Cross; The Church of The Resurrection, Surfside; The Protestant Episcopal Church of The Parish of Saint Philip, in Charleston, in the State of South Carolina; The Protestant Episcopal Church, The Parish of Saint Michael, in Charleston, in the State of South Carolina and St. Michael's Church Declaration of Trust; The Vestry and Church Wardens of St. Jude's Church of Walterboro; The Vestry and Church Wardens of The Episcopal Church of The Parish of Prince George Winyah; The Vestry and Church Wardens of The Church of The Parish of St. Helena and The Parish Church of St. Helena Trust; The Vestry and Church Wardens of The Parish of St. Matthew; The Vestry and Wardens of St. Paul's Church, Summerville; Trinity

Church of Myrtle Beach; Trinity Episcopal Church;
Trinity Episcopal Church, Pinopolis; Vestry and Church
Wardens of the Episcopal Church of The Parish of
Christ Church; Vestry and Church Wardens of The
Episcopal Church of the Parish of St. John's,
Charleston County, The Vestries and Churchwardens of
The Parish of St. Andrews,,..... Respondents,

v.

The Episcopal Church (a/k/a The Protestant Episcopal
Church in the United States of America) and The
Episcopal Church in South Carolina, Appellants.

PROOF OF SERVICE

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins
Riley & Scarborough LLP, attorneys for Respondents, do hereby certify that I have served all
counsel in this action with a copy of the pleading(s) hereinbelow specified by U.S. mail to the
following address(es):

Pleadings: **Motion for Admission Pro Hac Vice of Charles J. Cooper**

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Bluestein Nichols Thompson & Delgado
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Lisa Whitehurst
Administrative Assistant

September 1, 2017