

The Supreme Court of South Carolina

DANIEL E. SHEAROUSE
CLERK OF COURT

BRENDA F. SHEALY
CHIEF DEPUTY CLERK

POST OFFICE BOX 11330
COLUMBIA, SOUTH CAROLINA 29211
TELEPHONE: (803) 734-1080
FAX: (803) 734-0384

RECEIVED

July 13, 2018

JUL 13 2018

The Honorable Daniel E. Shearouse
Clerk of Court
South Carolina Supreme Court
Post Office Box 11330
Columbia, S.C. 29211

S.C. SUPREME COURT

RE: Crystal Wickersham v. Ford Motor Company
Case No.: 2018-001124

Dear Mr. Shearouse:

I certify that the Office of Bar Admissions has received verified applications requesting Thurston H. Webb and Adam H. Charnes be admitted *pro hac vice* in the above matter. The \$250 filing fee for each applicant has been paid.

Yours truly,

Margaret C. McGee/st
Deputy Clerk for Bar Admissions

MCM/st

THE STATE OF SOUTH CAROLINA
In The Supreme Court

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JUL 11 2018

Crystal L. Wickersham, as Personal Representative of the Estate of
John Harley Wickersham, Jr. S.C. SUPREME COURT Plaintiffs

v.

Ford Motor Company, Defendant.

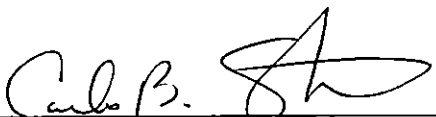
Appellate Case No. 2018-001124

**DEFENDANT FORD MOTOR COMPANY'S
MOTION TO ADMIT
ADAM H. CHARNES, PRO HAC VICE**

The undersigned, a member of the bar of this Court, hereby moves special admission of Adam H. Charnes for appearance as counsel of record in this case. This motion is based upon the showings contained in the declarations attached hereto.

The undersigned certifies that he has consulted with opposing counsel, who has consented to this admission.

July 11, 2018

By: 

J. Kenneth Carter, Jr. (SC Bar No. 12812)
Carmelo B. Sammataro (SC Bar No. 69746)
TURNER PADGET GRAHAM & LANEY P.A.
Post Office Box 1473
Columbia, SC 29202
Phone: (803) 254-2200
Fax: (803) 799-3957
KCarter@TurnerPadget.com
SSammataro@TurnerPadget.com

ATTORNEYS FOR DEFENDANT

THE STATE OF SOUTH CAROLINA
In the Supreme Court

RECEIVED

JUL 11 2018

Crystal L. Wickersham, as Personal Representative of the Estate of
John Harley Wickersham, Jr. Plaintiffs,

S.C. SUPREME COURT

v.

Ford Motor Company, Defendant.

Appellate Case No. 2018-001124

PROOF OF SERVICE

I certify this 11th day of July 2018 that I have served a copy of Defendant Ford Motor Company's Motion to Admit Adam H. Charnes, Pro Hac Vice upon other counsel of record, by mailing same, postage prepaid in the United States mail, addressed to the following:

Ronnie L. Crosby, Esquire
Peters, Murdaugh, Parker, Eltzroth &
Detrick, P.A.
P. O. Box 457
Hampton, SC 29924

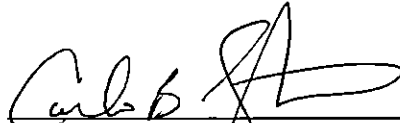
Kathleen C. Barnes, Esquire
Barnes Law Firm, LLC
P. O. Box 897
Hampton, SC 29924

ATTORNEYS FOR PLAINTIFFS

(Signature page to follow.)

July 11, 2018

By:



J. Kenneth Carter, Jr. (SC Bar No. 12812)
Carmelo B. Sammataro (SC Bar No. 69746)
TURNER PADGET GRAHAM & LANEY P.A.
Post Office Box 1473
Columbia, SC 29202
Phone: (803) 254-2200
Fax: (803) 799-3957
KCarter@TurnerPadget.com
SSammataro@TurnerPadget.com

ATTORNEYS FOR DEFENDANT

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.)

Membership in Pennsylvania Bar is currently inactive as noted in Exhibit 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):

Not applicable.

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):

Not applicable.

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):

Not applicable.

9. Local counsel of record associated with applicant in this case is Carmelo B. Sammataro of the Turner Padgett Graham & Laney P.A. law firm, which has offices at:

1901 Main Street, Suite 1700

Street Address			
<u>Columbia</u>	<u>Richland County</u>	<u>SC</u>	<u>29201</u>
City	County	State	Zip Code
<u>(803) 227-4253</u>	<u>(803) 546-3212</u>	<u>(803) 400-1532</u>	<u>SSammataro@TurnerPadgett.com</u>
Primary Telephone	Cell Phone	Fax Number	Email Address
<u>697466</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).

Edwards et al. v. The State of South Carolina, in the South Carolina Supreme Court; and South Carolina Ass'n of School Administrators v. Gov. Sanford, in the South Carolina Supreme Court

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 4th day of July, 2018

Ad H Chan
APPLICANT

VERIFICATION

STATE OF TEXAS)

COUNTY OF DALLAS)

I, Adam H. Charnes, 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.

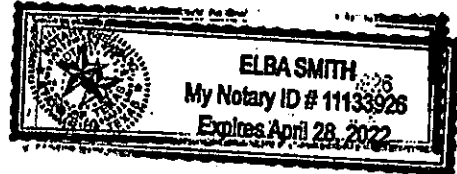
Adam H. Charnes
APPLICANT/AFFIANT

Subscribed and sworn to before me this 6th day of July, 20 18

Elba Smith

Notary Public for the State of TEXAS

My Commission Expires: 04/28/2022



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 11th day of July, 20 18

Carl B. [Signature]
LOCAL COUNSEL OF RECORD

CERTIFICATE OF SERVICE

Hand delivered
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

11th day of July, 20 18

Adam H. Charnes
APPLICANT/AFFIANT

Exhibit A
Adam H. Charnes

COURT	DATE OF ADMISSION	STATUS
DC Bar, No. 441697	May 2, 1994	Active
NC Bar, No. 32039	November 26, 2003	Active
TX Bar, No. 24090629	May 15, 2014	Active
First Circuit Bar, No. 52100	November 5, 1998	Active
PA Bar, No. 69070	November 29, 1993	Inactive
District of Columbia Court of Appeals	May 2, 1994	Active
U.S. Court of Appeals for the Fourth Circuit	January 5, 1994	Active
Supreme Court of the United States	August 29, 1997	Active
U.S. District Court for the Western District of Michigan	March 10, 1998	Active
U.S. District Court for the District of Columbia	April 6, 1998	Active
U.S. Court of Appeals for the First Circuit	November 5, 1998	Active
U.S. Court of Appeals for the Eleventh Circuit	January 28, 1999	Active
U.S. Court of Appeals for the Sixth Circuit	August 23, 2000	Active
North Carolina Supreme Court	November 26, 2003	Active
U.S. District Court for the Middle District of North Carolina	February 19, 2004	Active

U.S. District Court for the Western District of North Carolina	April 21, 2005	Active
U.S. District Court for the Eastern District of North Carolina	July 7, 2005	Active
U.S. Court of Appeals for the Ninth Circuit	February 9, 2007	Active
U.S. Court of Appeals for the Federal Circuit	June 19, 2009	Active
U.S. Court of Appeals for the Fifth Circuit	October 1, 2009	Active
U.S. Court of Appeals for the Tenth Circuit	June 30, 2010	Active
U.S. Court of Appeals for the Seventh Circuit	July 6, 2011	Active
U.S. Court of Appeals for the Third Circuit	August 26, 2011	Active
U.S. Court of Appeals for the Second Circuit	May 8, 2014	Active
U.S. District Court for the Eastern District of Texas	May 22, 2015	Active
U.S. District Court for the Northern District of Texas	June 11, 2015	Active

Supreme Court OF THE STATE OF NORTH CAROLINA



I, Amy L. Funderburk, Clerk of the Supreme Court of North Carolina, do hereby certify that on November 26, 2003, license to practice as an Attorney and Counselor at Law in all the Courts of this State was issued by the North Carolina Board of Law Examiners to

ADAM H. CHARNES

according to the certified list of licentiates reported by the Secretary of said Board and filed in my office as required by statute.

To the date of this certificate, no order revoking said license has been filed with this Court and no order suspending same is in effect.

WITNESS my hand and the Seal of the Supreme Court of North Carolina at office in Raleigh, this July 9, 2018.

A handwritten signature in cursive script that reads "Amy L. Funderburk".

Amy L. Funderburk
Clerk of the Supreme Court
of the State of North Carolina

