

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

RECEIVED

THE STATE OF SOUTH CAROLINA
In The Supreme Court

JUL 11 2018

S.C. SUPREME COURT

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

v.

Ford Motor Company, Defendant.

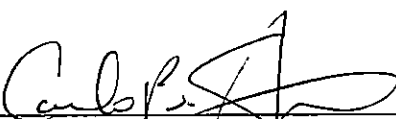
Appellate Case No. 2018-001124

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

The undersigned, a member of the bar of this Court, hereby moves special admission of Thurston H. Webb 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

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THE STATE OF SOUTH CAROLINA
In the Supreme Court

JUL 11 2018

S.C. SUPREME COURT

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

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 Thurston H. Webb, 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

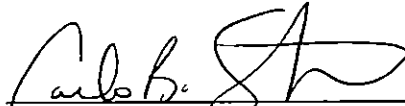
Kathleen C. Barnes, Esquire
Barnes Law Firm, LLC
P. O. Box 897
Hampton, SC 29924

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
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ATTORNEYS FOR DEFENDANT

THE STATE OF SOUTH CAROLINA
In The Supreme Court

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

v.

Ford Motor Company, Defendant.

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THURSTON H. WEBB, PRO HAC VICE

S.C. SUPREME COURT

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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

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.)

Not applicable.

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).

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 3rd day of July, 2018



APPLICANT

VERIFICATION

STATE OF Georgia
COUNTY OF Fulton

I, Thurston Webb, 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.

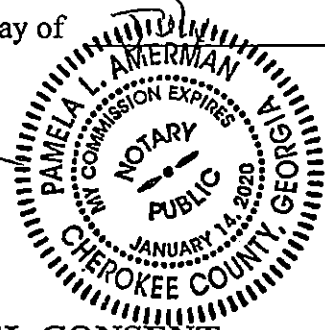
APPLICANT/AFFIANT

Subscribed and sworn to before me this 3rd day of _____, 20 18

Pamela L. Amerman

Notary Public for the State of Georgia

My Commission Expires: 1/14/20



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 11 day of July, 20 18

[Signature]
APPLICANT/AFFIANT

Exhibit A
Thurston H. Webb

COURT	DATE OF ADMISSION	STATUS
NC Bar, No. 40159	August 28, 2009	Active
USDC for Middle District of North Carolina	August 6, 2010	Active
USDC for Western District of North Carolina	March 5, 2012	Active
USDC for Eastern District of North Carolina	May 3, 2012	Active
Federal Claims		Active
DC Circuit	February 11, 2012	Active
Federal Circuit		Active
First Circuit		Active
Second Circuit		Active
Fourth Circuit	February 11, 2012	Active
Fifth Circuit	July 19, 2013	Active
Sixth Circuit	July 3, 2013	Active
Ninth Circuit		Active
Eleventh Circuit	April 20, 2011	Active
U.S. Supreme Court	December 2, 2013	Active

Supreme Court OF THE STATE OF NORTH CAROLINA



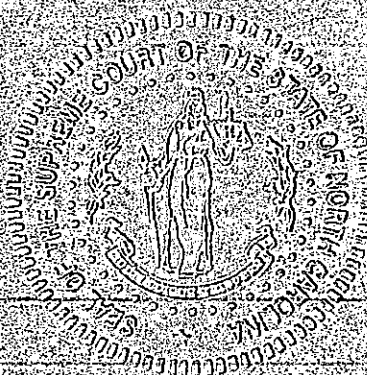
I, Amy L. Funderburk, Clerk of the Supreme Court of North Carolina, do hereby certify that on August 28, 2009, license to practice as an Attorney and Counselor at Law in all the Courts of this State was issued by the North Carolina Board of Law Examiners to

THURSTON H. WEBB

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.



Amy L. Funderburk

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

RECEIPT

180709142338

SUPREME COURT OF NORTH CAROLINA

P.O. Box 2170
Raleigh, N.C. 27602

Monday, July 09, 2018

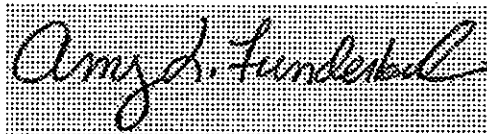
Received of: **Charnes & Webb** the sum of: **\$10.00**
Firm: **Kilpatrick Townsend & Stockton LLP**
in payment of the following items or parts thereof, as indicated, in the case of

_____ v. _____

No. _____

Fee Type	Count	Single	Extended
1. Docketing Appeal	0	\$10.00	\$0.00
2. Docketing Certiorari, Disc, Rev	0	\$10.00	\$0.00
3. Certificate of Good Standing	2	\$5.00	\$10.00
4. Bond	0		\$0.00
5. Opinion	0		\$0.00
6. Printing Notice of Appeal	0		\$0.00
7. Printing Record	0		\$0.00
8. Printing Petition	0		\$0.00
9. Printing Brief	0		\$0.00
10. Costs	0		\$0.00
11. Copies	0		\$0.00
12. Other	0		\$0.00
Total			\$10.00

Amy L. Funderburk
Clerk of the Supreme Court



By: Ashley Joyner

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.)

Not applicable.

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.

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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			
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Primary Telephone	Cell Phone	Fax Number	Email Address
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South Carolina Bar Number			

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DATED this 3rd day of July, 2018



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COUNTY OF Fulton

I, Thurston Webb, 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.

[Handwritten Signature]

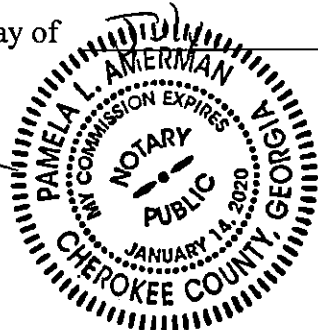
APPLICANT/AFFIANT

Subscribed and sworn to before me this 3rd day of _____, 20 18

[Handwritten Signature]

Notary Public for the State of Georgia

My Commission Expires: 1/14/20



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.

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[Handwritten Signature]
LOCAL COUNSEL OF RECORD

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Supreme Court OF THE STATE OF NORTH CAROLINA



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THURSTON H. WEBB

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

RECEIPT

180709142338

SUPREME COURT OF NORTH CAROLINA

P.O. Box 2170
Raleigh, N.C. 27602

Monday, July 09, 2018


Received of: **Charnes & Webb** the sum of: **\$10.00**
Firm: **Kilpatrick Townsend & Stockton LLP**
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12. Other	0		\$0.00
Total			\$10.00

Amy L. Funderburk
Clerk of the Supreme Court



By: Ashley Joyner

Turner | Padget

Carmelo B. Sammataro

E-mail: SSammataro@TurnerPadget.com

Writer's Direct Dial: (803) 227-4253

Writer's Direct Fax: (803) 400-1532

July 11, 2018

RECEIVED

JUL 11 2018

S.C. SUPREME COURT

VIA HAND DELIVERY

South Carolina Supreme Court

Office of Bar Admissions

P.O. Box 11330

Columbia, SC 29211

Re: Crystal L. Wickersham, as Personal Representative of the Estate of John Harley Wickersham, Jr. v. Ford Motor Company
Appellate Case No.: 2018-001124
File No.: 5100.354

Dear Sirs:

Enclosed please find a Verified Applications for Admission Pro Hac Vice of Adam H. Charnes and Thurston H. Webb in the State of South Carolina regarding the above-referenced matter. Also enclosed are two checks totaling the sum of \$500.00 for the filing fee. Please return a clocked copy of the Verified Application to our office via our office courier. Thank you for your assistance with this matter, and please contact me if you have any questions.

With kind regards, I am

Very truly yours,

TURNER, PADGET, GRAHAM & LANEY, P.A.



Carmelo B. Sammataro

CBS/tj

Enclosure

cc: Ronnie L. Crosby, Esquire
Kathleen C. Barnes, Esquire
(w/enc.)