

September 7, 2018

VIA HAND DELIVERY

The Honorable Daniel E. Shearouse
Clerk, South Carolina Supreme Court
P.O. Box 11330
Columbia, SC 29211

Re: *Crystal L. Wickersham; Crystal L. Wickersham, as Personal Representative of the Estate of John Harley Wickersham, Jr. v. Ford Motor Company*
Appellate Case No. 2018-001124
HSB File No.: 39655.0002

Dear Sir:

I am counsel for *amicus curiae* Alliance of Automobile Manufacturers, Inc. in the above-captioned matter. Please find enclosed for filing the original and seven (7) copies of the following concerning the above matter:

1. Motion to Admit Counsel *Pro Hac Vice* for Phil S. Goldberg, Esq., including the application form required by Rule 404(d), SCACR, and certificate of good standing in the Bar of the District of Columbia Court of Appeals;
2. Motion to Admit Counsel *Pro Hac Vice* for Victor E. Schwartz, Esq., including the application form required by Rule 404(d), SCACR, and certificate of good standing in the Bar of the District of Columbia Court of Appeals;
3. Motion to Admit Counsel *Pro Hac Vice* for Cary Silverman, Esq., including the application form required by Rule 404(d), SCACR, and certificate of good standing in the Bar of the District of Columbia Court of Appeals;

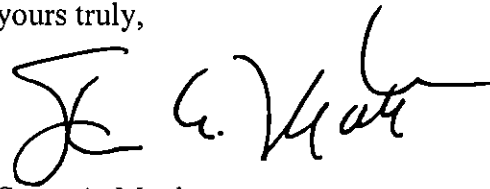
I would appreciate your filing the original Motions and returning a clocked copy to my courier. I have enclosed our check in the amount of \$75.00 to cover the three motion filing fees.

By copy of this letter, I am serving these motions upon all counsel of record.

The Honorable Daniel E. Shearouse
September 7, 2018
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Thank you for your assistance. Please call me if you have any questions. With best regards, I remain

yours truly,



Steve A. Matthews

Enclosures

cc : Carmelo Barone Sammataro
Adam Howard Charnes
Thurston Holderness Webb
Joseph Kenneth Carter, Jr.
Kathleen Chewing Barnes
Ronnie Lanier Crosby

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S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In The Supreme Court

CERTIFIED QUESTIONS FROM
THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF
SOUTH CAROLINA

Appellate Case No. 2018-001124

Crystal L. Wickersham; Crystal L. Wickersham, as Personal Representative of the Estate of John
Harley Wickersham, Jr. v. Ford Motor Company

..... Plaintiff

v.

General Motors, LLC Defendant

MOTION TO ADMIT COUNSEL PRO HAC VICE – PHIL S. GOLDBERG

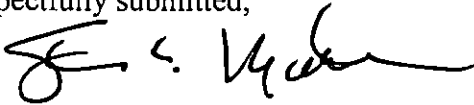
Pursuant to Rule 404, SCACR , *amicus curiae* Alliance of Automobile Manufacturers, Inc. (“the Alliance”) moves for the admission *pro hac vice* of Phil S. Goldberg, Esq., as counsel for the Alliance in connection with this appeal. In support of this motion, the undersigned shows the court as follows:

1. Mr. Goldberg is a practicing member in good standing of the District of Columbia Court of Appeals Bar, which grants like privileges to out-of-state attorneys to practice on a *pro hac vice* basis. He is a partner with the law firm of Shook, Hardy & Bacon, L.L.P. and works in its office located at 1155 F Street, NW, Suite 200, Washington, DC 20004.
2. A copy of Mr. Goldberg’s Verified Application for Admission *Pro Hac Vice*, including a Certificate of Good Standing in the Bar of the District of Columbia Court of Appeals, is attached as Exhibit A. Mr. Goldberg agrees to be bound by the applicable South Carolina Rules Governing the Practice of Law.

3. The undersigned, Steve A. Matthews, is admitted to practice in the State of South Carolina, is a member in good standing of the South Carolina Bar, and will be associated with Mr. Goldberg and will be counsel of record on behalf of the Alliance in this matter.

WHEREFORE, the undersigned respectfully requests that the Court order the admission *pro hac vice* of Phil S. Goldberg as counsel for *amicus curiae* Alliance of Automobile Manufacturers, Inc. in connection with this case.

Respectfully submitted,

By: 

Steve A. Matthews

S.C. Bar 3689

HAYNSWORTH SINKLER BOYD, P.A.

1201 Main Street, 22nd Floor

Columbia, SC 29201

(803) 779-3080

smatthews@hsblawfirm.com

*Counsel for Amicus Curiae Alliance of Automobile
Manufacturers, Inc.*

September 7, 2018

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SEP 07 2018
S.C. SUPREME COURT

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

<u>Crystal Wickersham</u> Plaintiff	<u>2018-001124</u> Case No.	<u>Supreme Court of South Carolina</u> Tribunal
vs.		
<u>Food Motor Company</u> Defendant	Mailing Address of Tribunal:	<u>Supreme Court Building</u> <u>1231 Gervais Street</u> <u>Columbia, South Carolina 29201</u>

Comes now Philip S. Goldberg, applicant herein, and respectfully represents the following:

1. Applicant resides at:
9500 Singleton Drive
Street Address

<u>Bethesda</u> City	<u>Montgomery</u> County	<u>Maryland</u> State	<u>20817</u> Zip Code
<u>301-564-0099</u> Telephone			

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Shook, Hardy & Bacon L.L.P., with offices at 1155 F Street, NW, Suite 200
Street Address

<u>Washington</u> City	<u>County</u>	<u>D.C.</u> State	<u>20004</u> Zip Code
<u>202-783-8400</u> Primary Telephone	<u>301-908-4367</u> Cell Phone	<u>202-783-4211</u> Fax Number	<u>pgoldberg@shb.com</u> Email Address

3. Applicant has been retained personally or as a member of the above-named law firm by Alliance of Automobile Manufacturers 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 October of 2004, 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:
District of Columbia	2004
Maryland	2001
New Jersey	2001
U.S. Court of Appeals for Third Circuit	2007
U.S. Court of Appeals for Fourth Circuit	2015
U.S. Court of Appeals for Fifth Circuit	2010
U.S. Court of Appeals for Sixth Circuit	2010
U.S. Court of Appeals for the Ninth Circuit	2010
Supreme Court of the United States	2010

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 Steve A. Matthews of the Haynsworth Sinkler Boyd, P.A. law firm, which has offices at:

1201 Main Street, 22nd Floor

Street Address

Columbia

City

803-779-3080

Primary Telephone

3689

South Carolina Bar Number

County

Cell Phone

South Carolina

State

803-765-1243

Fax Number

29201

Zip Code

smatthews@hsblawfirm.com

Email Address

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).

Donze v. General Motors, LLC, South Carolina Supreme Court, No. 001437, decided May 17, 2017, local counsel of record Steve A. Matthews of Haynsworth Sinkler Boyd, P.A., application 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 4th day of September, 20 18



APPLICANT

VERIFICATION

STATE OF District of Columbia)

COUNTY OF _____)

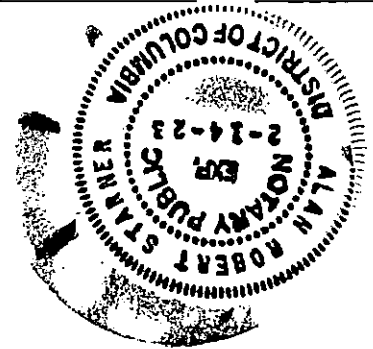
I, Phil Goldberg, do hereby swear or affirm under penalty of perjury that I am the applicant in the above-styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, 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 4 day of SEPTEMBER, 20 18

[Signature]

Notary Public for the State of ALAN ROBERT STARNER
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires: My Commission Expires February 14, 2023



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 7th day of September, 20 18

[Signature]
LOCAL COUNSEL OF RECORD

CERTIFICATE OF SERVICE

hand delivery
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

7th day of September, 20 18

[Signature]
APPLICANT/AFFIANT

[Signature]
Local Counsel of Record



DCBAR

On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals,
the District of Columbia Bar does hereby certify that

Philip Seth Goldberg

was duly qualified and admitted on **October 4, 2004** 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, 2018.

Julio A. Castillo
JULIO A. CASTILLO
Clerk of the Court

Issued By:

ABM
District of Columbia Bar Membership

For questions or concerns, please contact the D.C. Bar Membership Office at 202-626-3475 or email
memberservices@dcbat.org.