

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;

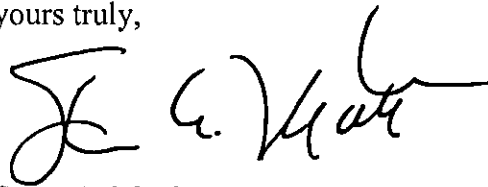
I would appreciate your filing the original Motions and returning a clocked copy to my courier. I have enclosed our check in the amount of \$75.00 to cover the three motion filing fees.

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

RECEIVED

SEP 07 2018

CERTIFIED QUESTIONS FROM S.C. SUPREME COURT
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 – CARY SILVERMAN

Pursuant to Rule 404, SCACR , *amicus curiae* Alliance of Automobile Manufacturers, Inc. (“the Alliance”) moves for the admission *pro hac vice* of Cary Silverman, 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. Silverman 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. Silverman’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. Silverman 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. Silverman 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 Cary Silverman, Esq. 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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6.

Court:	Date Admitted:
District of Columbia	2002
Maryland	2000
U.S. Supreme Court	2005
U.S. Court of Appeals for the D.C. Circuit	2006
U.S. Court of Appeals for the Third Circuit	2016
U.S. Court of Appeals for the Fourth Circuit	2013
U.S. Court of Appeals for the Fifth Circuit	2010
U.S. Court of Appeals for the Sixth Circuit	2013
U.S. Court of Appeals for the Ninth Circuit	2016
U.S. Court of Appeals for the Eleventh Circuit	2018
U.S. District Court for the District of Columbia	2002
U.S. District Court for the District of Maryland	2001

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

7. 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

8. 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

9. 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

10. 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:

<u>1201 Main Street, 22nd Floor</u>		<u>South Carolina</u>		<u>29201</u>
Street Address		State		Zip Code
<u>Columbia</u>	<u>County</u>	<u>South Carolina</u>	<u>803-765-1243</u>	<u>smatthews@hsblawfirm.com</u>
<u>City</u>	<u>County</u>	<u>State</u>	<u>803-765-1243</u>	<u>smatthews@hsblawfirm.com</u>
<u>803-779-3080</u>	<u>Cell Phone</u>	<u>Fax Number</u>	<u>803-765-1243</u>	<u>Email Address</u>
<u>Primary Telephone</u>	<u>Cell Phone</u>	<u>Fax Number</u>	<u>803-765-1243</u>	<u>Email Address</u>
<u>3689</u>	<u>Cell Phone</u>	<u>Fax Number</u>	<u>803-765-1243</u>	<u>Email Address</u>
<u>South Carolina Bar Number</u>		<u>803-765-1243</u>		<u>Email Address</u>

11. 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).

Jamison v. Morris Texaco Mini Mart, South Carolina Supreme Court, No. 26720, Decision filed Sept. 21, 2009, local counsel of record John T. Lay, Jr. of Ellis, Lawhorne & Sims, P.A., application granted.

12. 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.

13. 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 _____)

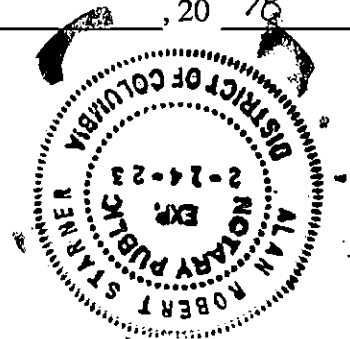
I, Cary Silverman, do hereby swear or affirm under penalty of perjury that I am the applicant in the above-styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and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

Cary Silverman
APPLICANT/AFFIANT

Subscribed and sworn to before me this 4 day of SEPTEMBER, 20 18

Alan Robert Starnier

Notary Public for the State of ALAN ROBERT STARNIER
NOTARY PUBLIC DISTRICT OF COLUMBIA
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

J. C. Moore
LOCAL COUNSEL OF RECORD

CERTIFICATE OF SERVICE

hand deliver
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

Cary Silverman
APPLICANT/AFFIANT

J. C. Moore
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

Gary Silverman

was duly qualified and admitted on **October 12, 2001** 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@dcbbar.org.