



*Permanente, Suite 2100  
1230 Peachtree Street, N.E.  
Atlanta, Georgia 30309-3597  
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Fax: 404-815-3500  
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**SMITH GAMBRELL & RUSSELL, LLP**  
*Attorneys At Law*

**FAX COVER SHEET**

DATE: 9/21/2018

<b>Send To:</b>	<b>Company/Firm:</b>	<b>Telephone:</b>	<b>Telecopy:</b>
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**From:** Wilson, Jutta      **Telecopy:** 404-815-3509      **Phone:** 404-815-3500, x53236      **Client/Matter:** 065229.000      **Number of Pages:** 17  
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SEP 21 2018

S.C. SUPREME COURT

**CONFIDENTIALITY NOTE:**

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*From:* Smith, Debbie  
*To:* 1230 Peachtree Street, N.E.  
*Address:* Atlanta, Georgia 30309-3332  
*Phone:* 404.633.8300  
*www.sgrflaw.com*

**SMITH GAMBRELL & RUSSELL, LLP**  
*Attorneys at Law*

September 21, 2018

*Via Telecopier 803-734-1499  
and via U.S. Mail*

**RECEIVED**

SEP 21 2018

**S.C. SUPREME COURT**

South Carolina Supreme Court  
Attention: Debbie Smith  
P.O. Box 11330  
Columbia, SC 29211

Re: Petition for Writ of Certiorari  
Kunst v. Loree  
Appellate Number: 2015-001536

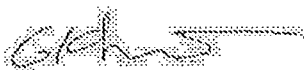
Dear Ms. Smith:

Pursuant to Rule 404(c), enclosed please find the order admitting me pro hac vice into the Kunst v. Loree matter, Appellate Case No. 2015-001536. I am admitted under V. Elizabeth Wright, South Carolina Bar number 76029.

Should you require any further information, please don't hesitate to contact me.

Kind regards,

**SMITH GAMBRELL & RUSSELL, LLP**



Gregory K. Smith

GKS/jw  
Attachment:

2015 MAR 24 PM 2 16

STATE OF SOUTH CAROLINA  
COUNTY OF PICKENS  
SOUTH CAROLINA  
IN THE COURT OF COMMON PLEAS  
PICKENS COUNTY  
CASE NO. 2006-CP-39-1826

L. Scott Kunst,  
Plaintiff,  
v.  
David Force,  
Defendant.

ORDER TO ADMIT COUNSEL  
PRO HAC VICE

THIS ORDER is pursuant to a Motion filed by local counsel v. Elizabeth Wright, for Defendant David Force to have Gregory K. Smith of the Georgia Bar admitted *pro hac vice*.

All conditions of Rule 403, SCOR, have been met and satisfied.

THEREFORE IT IS ORDERED as follows:

- 1. That Gregory K. Smith be admitted *pro hac vice* to the Bar of this Court, for the purposes of the above-captioned matter;
- 2. That, along with local counsel v. Elizabeth Wright, Mr. Smith be entitled to represent David Force in all motions, trial proceedings, hearings, trials and any other proceedings in this Court. Mr. Smith has also consented to and is required to abide by the ethical standards governing the practice of law in this Court pursuant to Rule 403(c), SCOR.

IT IS SO ORDERED.

*Latitia Verdine*  
Presiding Judge, Thirteenth Judicial Circuit

#2162

Greenville, South Carolina  
Mar 24 2015

Certified Copy

*Harold P. Williams*

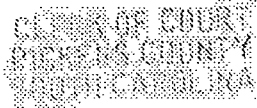
Clerk of Court  
Pickens County, SC

Dated Mar 2015  
ms

# COVINGTON, PATRICK, HAGINS, STERN & LEWIS, LLC

An Association of Independent Attorney Professional Associations

E. S. Stern, Jr.  
Direct Dial: (864) 240-5516  
Direct Fax: (864) 240-5545  
E-Mail: [esstern@covpatlaw.com](mailto:esstern@covpatlaw.com)



2015 MAR 18 P 3:59

864.242.9000  
864.233.9777 Fax  
1.800.840.2988

V. Elizabeth Wright  
Associate  
Direct Dial: (864) 240-5519  
E-Mail: [hwright@covpatlaw.com](mailto:hwright@covpatlaw.com)

Writer's Direct E-Mail: [hwright@covpatlaw.com](mailto:hwright@covpatlaw.com)  
Direct Dial: (864) 240-5519

March 16, 2015

The Honorable Pat Welborn  
Clerk of Court for Pickens County  
214 E. Main Street  
Pickens, SC 29671

RE: Kunst v. Lorce  
2006-CP-39-1826

Dear Mr. Welborn:

Please find enclosed for filing the original and two copies of the Motion for Admission *Pro Hac Vice*. By copy of this correspondence I am serving the *pro se* Plaintiff by U.S. first class mail.

Very truly yours,

COVINGTON, PATRICK, HAGINS,  
STERN & LEWIS, LLC

  
V. Elizabeth Wright

BW  
Enclosures

cc: J. Scott Kunst, *pro se*

STATE OF SOUTH CAROLINA  
COUNTY OF PICKENS

IN THE COURT OF COMMON PLEAS  
THIRTEENTH JUDICIAL CIRCUIT

2015 MAR 18 PM 3:58

CASE NO. 2006-CP-39-1826

J. Scott Kunst, pro se

Plaintiff

MOTION AND ORDER INFORMATION  
FORM AND COVER SHEET

vs.

David Lorie

Defendant

Plaintiff's Attorney:

J. Scott Kunst, pro se  
Address: 130 Arabian Way  
Simpsonville, SC 29681  
Phone: Fax:  
E-mail: Other:

Defendant's Attorney:

V. Elizabeth Wright, Bar No. 76029  
Covington, Patrick, Hagin, Stern & Lewis, P.A.  
Address: P.O. Box 2343, Greenville, SC 29603  
Phone: 864.242.9000 Fax 864.233.9777  
E-mail: hwright@covpatlaw.com Other:

- MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)
- FOR MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)
- PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)

SECTION I: Hearing Information

Nature of Motion: *Pro Hac Vice*

Estimated Time Needed:

Court Reporter Needed:  YES  NO

SECTION II: Motion/Order Type

- Written motion attached
- Form Motion/Order

I hereby move for relief or action by the court as set forth in the attached proposed order.

*[Signature]*  
Signature of Attorney for  Plaintiff  Defendant

*3/16/18*  
Date submitted

SECTION III: Motion Fee

- PAID - AMOUNT: \$ *25.00*
- EXEMPT: (check reason)
  - Rule to Show Cause in Child or Spousal Support
  - Domestic Abuse or Abuse and Neglect
  - Indigent Status:  State Agency v. Indigent Party
  - Sexually Violent Predator Act  Post-Conviction Relief
  - Motion for Stay in Bankruptcy
  - Motion for Publication  Motion for Execution (Rule 69, SCRPC)
  - Proposed order submitted at request of the court or reduced to writing from motion made in open court per judge's instructions.
- Name of Court Reporter: \_\_\_\_\_
- Other: \_\_\_\_\_

JUDGE'S SECTION

Motion Fee to be paid upon filing of the attached order.

JUDGE CODE: \_\_\_\_\_

Other: \_\_\_\_\_

Date: \_\_\_\_\_

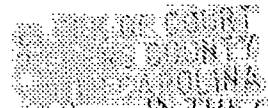
CLERK'S VERIFICATION

Collected by: *Ronnie Fox* Date Filed: *3/16/18*

MOTION FEE COLLECTED: \$ *25.00*

CONTESTED AMOUNT DUE: \$ \_\_\_\_\_

STATE OF SOUTH CAROLINA  
COUNTY OF PICKENS



IN THE COURT OF COMMON PLEAS  
CASE NO. 2006-CP-39-1836

E. Scott Kunst  
Plaintiff  
v.  
David Loree  
Defendant

**MOTION FOR ADMISSION  
PRO HAC VICE**

Pursuant to Rule 404, SCACR, Gregory K. Smith, Esquire of the firm of King & Spaulding, L.L.P. in Atlanta, Georgia moves to appear *pro hac vice* as counsel for Defendant David Loree, along with local counsel N. Elizabeth Wright (S.C. Bar ID 76029), whose address and telephone number are listed below:

Mr. Smith is a member in good standing of the highest court of the State of Georgia. Mr. Smith agrees to abide by the ethical standards governing the practice of law in the State of South Carolina, pursuant to Rule 404, SCACR.

Mr. Smith's Verified Application for Admission *Pro Hac Vice* is attached as Ex. A. This application includes Mr. Smith's Affidavit and a Certificate of Good Standing from the Supreme Court of Georgia. Ex. B is the March 3, 2015 Verification of Application and Payment of Filing Fee from the South Carolina Supreme Court. Ex. C is a proposed order.

COVINGTON, PATRICK, HAGINS,  
STERN & LEWIS, LLC

E.S. Stern, Jr. (S.C. Bar #5857)  
E-Mail: esstern@covpathw.com  
N. Elizabeth Wright (S.C. Bar #76029)  
E-Mail: bwright@covpatlaw.com

211 Pettigrew Street  
P.O. Box 2343 (29602)  
Greenville, SC 29601  
864.242.9000

Greenville, South Carolina  
March 16, 2015

**EX. A**



Applicant is presently a member in good standing of the bar of the state courts of this state, except as listed below (fill in court name 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 complaint pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court, date):

N/A

7. Applicant has or has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission rescinded, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order or denial or rescission):

N/A

8. Applicant has or has had any certificate or privilege to appear and practice before any administrative body suspended or revoked, except as provided below (give particulars, e.g., date, administrative body, date of suspension and reinstatement):

N/A

9. Local counsel of record associated with applicant in this case is Y. Elizabeth Wright of the Cochran, Patrick, Blahs, Swann & Lewis, LLC law firm which has office at:

111 Penum Street

Street Address

Greenville

Courts

873 P.E. 9000

Telephone

Greenville

City

South Carolina

State

29601

Zip Code

If applicable list all other firms attorneys with are associated with in this matter:

N/A

10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and state 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 court for this case only.

DATED this 27<sup>th</sup> day of August, 2015.


APPLICANT

VERIFICATION

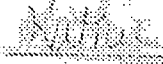
STATE OF GEORGIA

COUNTY OF FULTON

I, Gregory Keith Smith, do hereby swear or affirm under penalty of perjury that I am the applicant in the above  
captioned 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.

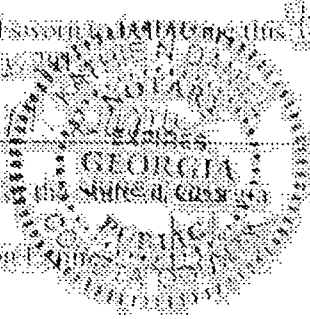
  
APPLICANT AFFIANE

Subscribed and sworn to before me this  
day of February, 2018.



Notary Public for the State of Georgia

My Commission Expires



LOCAL COUNSEL CONSENT


I hereby consent, as local counsel of record, to the appointment of applicant in this cause pursuant to Rules  
Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 22<sup>nd</sup> day of February, 2018.

  
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 Admission, PO Box 11730, Columbia, SC 29211,  
accompanied by payment of the \$750 filing fee payable to the South Carolina Supreme Court on this 22<sup>nd</sup> day of  
February, 2018.

  
APPLICANT AFFIANE

STATE OF GEORGIA )  
 ) AFFIDAVIT  
COUNTY OF FULTON )

PERSONALLY APPEARED BEFORE ME Gregory Keith Smith, a member of the Bar of the State of Georgia, who deposes as follows:


1. I am an attorney licensed to practice law in the State of Georgia;
2. I seek to be allowed to appear *pro hac vice* in the Court of Common Pleas, Pickens County, State of South Carolina in the action *Kunst v. Loree*, civil action number 2006-CP-39-1826;
3. I am not a member of the South Carolina Bar;
4. I am not regularly employed to practice law in the State of South Carolina;
5. I am not regularly engaged in professional practices in the State of South Carolina.

FURTHER AFFIANT SAYETH NAUGHT.

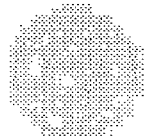
  
\_\_\_\_\_  
Gregory K. Smith

SWORN TO BEFORE ME

This 9<sup>th</sup> day of February, 2015

 *Kathleen N. ...*  
\_\_\_\_\_  
Notary Public for the State of Georgia

My Commission Expires \_\_\_\_\_



Supreme Court  
State of Georgia  
STATE JUDICIAL BUILDING  
Atlanta 30334

HUGH P. THOMPSON, CHIEF JUSTICE  
P. HARRIS HINES, PRESIDING JUSTICE  
ROBERT BENHAM  
CAROL W. HUNSTEIN  
HAROLD D. MELTON  
DAVID S. NANNIAS  
KEITH H. BLACKWELL  
JUSTICES

FRENESC S. BARNES, CLERK  
JEAN RUSWELL, REPORTER

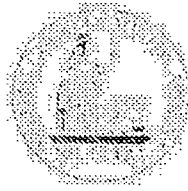
February 5, 2015

I hereby certify that Gregory Keith Smith, Esq. was admitted on the 29<sup>th</sup> day of April, 2002, as a member of the bar of the Supreme Court of Georgia, the highest court of this State, and, since that date he has been and is now a member of this bar in good standing, as appears from the records and files in this office.

Witness my signature and the seal of this Court  
hereto affixed the day and year first above written.

*Frenesc S. Barnes* Clerk

**Ex. B**



# The Supreme Court of South Carolina

DANIEL L. SHEAHOUSE  
Clerk of Court

GRENDA L. SHERLY  
Clerk of Court

REGISTRATION INFORMATION  
REGISTRATION INFORMATION  
REGISTRATION INFORMATION  
REGISTRATION INFORMATION

March 3, 2015

Clerk of Court  
Pickens County  
P.O. Box 215  
Pickens 29671

RE: J. Scott Kunster v. David Lorge  
Civil Action No. 2006-CP-39-1826

Dear Clerk of Court:

I certify that the Office of Bar Admissions has received a verified application requesting Gregory Keith Smith be admitted *pro hac vice* in the above action. The \$250 filing fee for the applicant has been paid.

Yours truly,

  
Deputy Clerk for Bar Admissions

CBW/st

Ex. C

STATE OF SOUTH CAROLINA  
COUNTY OF PICKENS

IN COURT  
SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

CASE NO. 2006-CP-39-1826

J. Scott Kunst,

2015 MAR 18 4:00

Plaintiff(s)

CERTIFICATE OF SERVICE

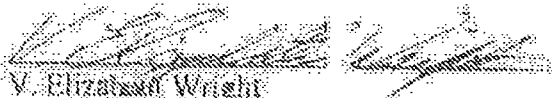
v.

David Lorce,

Defendant(s)

I, V. Elizabeth Wright, an attorney with the law firm of Covington, Patrick, Hargis, Stern & Lewis, LLC, do hereby certify that on the 16<sup>th</sup> day of March, 2015, I deposited into the U.S. Mail, First-Class postage prepaid, the Motion for Admission *Pro Hac Vice* to the *pro se* litigant at the address listed below:

J. Scott Kunst  
130 Arabian Way  
Simpsonville, SC 29681

  
V. Elizabeth Wright

Greenville, South Carolina  
March 16, 2015