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1230 Peachtree Street, N.E.
Atlanta, Georgia 30309-3592
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SMITH, GAMBRELL & RUSSELL, LLP
Attorneys at Law

September 21, 2018

RECEIVED

SEP 25 2018

S.C. SUPREME COURT

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

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

J. Scott Kunst,)
)
Plaintiff,)
)
v.)
)
David Loree,)
)
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 Loree to have Gregory K. Smith of the Georgia Bar admitted *pro hac vice*.

All conditions of Rule 404, SCCR, 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 Loree 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 404(c), SCACR.

IT IS SO ORDERED.

of Letitia Verdier
Presiding Judge, Thirteenth Judicial Circuit

#2162

Greenville, South Carolina

Mar. 24, 2015

Certified Copy

Handel P. Walker

**Clerk of Court
Pickens County, SC**

Dated Mar. 2015

mb

COVINGTON, PATRICK, HAGINS, STERN & LEWIS, LLC

An Association of Independent Attorney Professional Associations

T. S. Stern, Jr.
Direct Dial: (864) 240-5516
Direct Fax: (864) 240-5545
E-Mail: sstern@covpatlaw.com

CLERK OF COURT
PICKENS COUNTY
SOUTH CAROLINA

2015 MAR 18 P 3:59

864.242.9000
864.233.9777 Fax
1.800.849.2988

V. Elizabeth Wright
Associate
Direct Dial: (864) 240-5519
E-Mail: bwright@covpatlaw.com

Writer's Direct E-Mail: bwright@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. Loree
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

CLERK OF COURT
 PICKENS COUNTY
 SOUTH CAROLINA

2015 MAR 18 P 3:59

IN THE COURT OF COMMON PLEAS
 THIRTEENTH JUDICIAL CIRCUIT

CASE NO.: 2006-CP-39-1826

J. Scott Kunst, pro se
 Plaintiff,
 vs.
David Loree
 Defendant.

**MOTION AND ORDER INFORMATION
 FORM AND COVERSHEET**

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, Hagins, Stern & Lewis, P.A. Address: P.O. Box 2343, Greenville, SC 29602 Phone: 864.242.9000 Fax 864.233.9777 E-mail: bwright@covpatlaw.com Other:
---	---

- MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)
- FORM 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.

V. Elizabeth Wright
 Signature of Attorney for Plaintiff / Defendant

Date submitted: 3-16-15

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.
 Other: _____

JUDGE CODE _____
 Date: _____

CLERK'S VERIFICATION

Collected by: Ronnie Fox Date Filed: 3-16-15
 MOTION FEE COLLECTED: \$ 25.00
 CONTESTED - AMOUNT DUE: \$ _____

MOTION FEE PAID

CLERK OF COURT
PICKENS COUNTY
SOUTH CAROLINA

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF PICKENS

2015 MAR 18 P 3:59
CASE NO. 2006-CP-39-1826

J. 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 V. 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



T.S. Stern, Jr. (S.C. Bar #5837)
E-Mail: sstern@covpatlaw.com
V. Elizabeth Wright (S.C. Bar #76029)
E-Mail: bwright@covpatlaw.com

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

Greenville, South Carolina
March 16, 2015

Ex. A

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

J. Scott Kunst

2006-CP-39-1826

COUNTY OF PICKENS
COURT OF COMMON PLEAS
Court

Plaintiff

Case No

vs.

David Loriee

Defendant

Mailing Address of Court: 214 E. Main Street
Pickens, SC 29671

Comes now Gregory Keith Smith, applicant herein, and respectfully represents the following:

1. Applicant resides at:

804 Sylvania Court

Street Address

Mableton

Cobb

Georgia

30126

City

County

State

Zip Code

404-308-1589

Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) King & Spalding LLP, with offices at, at

180 Peachtree Street

Street Address

Atlanta

Fulton

Georgia

30309

City

County

State

Zip Code

404-572-4600

Telephone

404-572-5138

Fax Number

3. Applicant has been retained personally or as a member of the above named law firm by Defendant David Loriee to provide legal representation in connection with the above case now pending before the above named court of the State of South Carolina.

4. Since 28 April of 2002, 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 Georgia where applicant regularly practices law. Attached is a certificate of good standing.

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:
Georgia Court of Appeals	April 29, 2002
United States District Court for the Northern District of Georgia	April 29, 2002
United States District Court for the Middle District of Georgia	November 29, 2007
United States Court of Appeals for the Eleventh Circuit	May 17, 2004

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FEB 24 2015

S.C. SUPREME COURT

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 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 V. Elizabeth Wright, of the Covington, Patrick, Hagins, Stern & Lewis, LLC law firm, which has offices at:

211 Pettigru Street

Street Address

Greenville

Greenville

South Carolina

29601

County

City

State

Zip Code

864-242-9000

Telephone

If applicable list all other firms attorneys you 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 status 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 9th day of February, 2015

APPLICANT

VERIFICATION

STATE OF GEORGIA

COUNTY OF FULTON

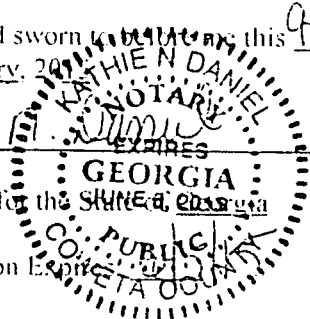
I, Gregory Keith Smith, do hereby swear or affirm under penalty of perjury that I am the applicant in the above styled matter, that I have read the foregoing application and know the contents thereof, and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true.

APPLICANT/AFFIANT

Subscribed and sworn to before me this 11th day of February, 2015.

Kathie N. Daniel

Notary Public for the State of Georgia
My Commission Expires 02/28/2018



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 February, 2015.

V. Elizabeth Whiff

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 Admissions, PO Box 1130, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this 9th day of February, 2015.

GKS

APPLICANT/AFFIANT

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.



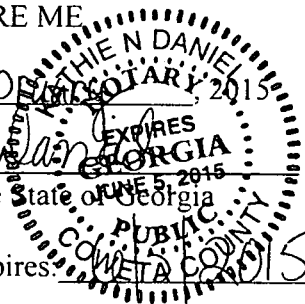
Gregory K. Smith

SWORN TO BEFORE ME

This 9th day of February, 2015

Kathie N. Daniel
Notary Public for the State of Georgia

My Commission Expires: JUNE 5, 2015





**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 E. NAHMAS
KEITH R. BLACKWELL
JUSTICES

THÉRÈSE S. BARNES, CLERK
JEAN RUSKELL, REPORTER

February 5, 2015

I hereby certify that Gregory Keith Smith, Esq., was admitted on the 29th 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.

Therese S Barnes, Clerk

Ex. B



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) 734-0392

March 3, 2015

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

RE: J. Scott Kunst v. David Loree
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

GBW/st

Ex. C

STATE OF SOUTH CAROLINA
COUNTY OF PICKENS

CLERK OF COURT
PICKENS COUNTY
SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

CASE NO. 2006-CP-39-1826

J. Scott Kunst,

2015 MAR 18 P 4: 00
Plaintiff(s).

CERTIFICATE OF SERVICE

v.

David Loree.

Defendant(s).

I, V. Elizabeth Wright, an attorney with the law firm of Covington, Patrick, Hagins, Stern & Lewis, LLC, do hereby certify that on the 16th 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