

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Mikell Scarborough, Master-in-Equity for Charleston County

Appellate Case No. 2018-001464

Vanessa Williams, Vanessa Williams, as Conservator and Guardian of
Sandra P. Perkins, and Vanessa Williams, as Personal Representative of
the Estate of Sandra P. Perkins, Plaintiff

v.

Bradford Q. Jeffcoat Jr., and Blue Heron Builders, LLC, Defendants

Of Whom Bradford Q. Jeffcoat, Jr. is the Appellant.

and Of Whom Vanessa Williams, Vanessa Williams, as Conservator and
Guardian of Sandra P. Perkins, and Vanessa Williams, as Personal
Representative of the Estate of Sandra P. Perkins is the Respondent.

MOTION FOR ADMISSION *PRO HAC VICE*

Pursuant to Rule 404, SCACR, Andrew M. Sullivan of the firm of Clawson & Staubes, LLC, the undersigned counsel for the Respondent, Vanessa Williams, Vanessa Williams, as Conservator and Guardian of Sandra P. Perkins, and Vanessa Williams, as Personal Representative of the Estate of Sandra P. Perkins, a member in good standing of the South Carolina Bar, hereby moves this Honorable Court for an Order admitting John Andrew Wenzel, Esq. *Pro Hac Vice* in this case as co-counsel for the Respondent, together with the attached Verified Application for Admission *Pro Hac Vice* and supporting documentation.

[SIGNATURE PAGE TO FOLLOW]

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SC Court of Appeals

I SO MOVE:

CLAWSON and STAUBES, LLC



Andrew M. Sullivan

Bar No.: 100464

1612 Marion Street, Suite 200

Columbia, South Carolina 29201-2939

Phone: (800) 774-8242

Fax: (843) 722-2867

Email: asullivan@clawsonandstaubes.com

Attorney for Respondent

October 26, 2018

Other Counsel of Record

Jason Scott Luck

Garret Law Offices, LLC

1075 E. Montague Ave.

North Charleston, SC 29405

Attorney for Appellant

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

Vanessa Williams, Vanessa Williams, as
Conservator and Guardian of Sandra P.
Perkins, and Vanessa Williams, as Personal
Representative of the Estate of Sandra P.
Perkins

2018-001464

Court of Appeals

Plaintiff

Case No.

Court

vs.

Bradford Q. Jeffcoat, Jr., and Blue Heron
Builders, LLC

Mailing Address of Court: 1220 Senate Street
Columbia, SC 29201

Defendant

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Comes now John Andrew Wenzel, applicant herein, and respectfully represents the following:

1. Applicant resides at:

206 Cuscowilla Lane

Street Address

Fairhope

City

251-942-7375

Telephone

Baldwin

County

AL

State

36532

Zip Code

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Caldwell

Wenzel & Asthana, PC, with offices at, at

218 N. Alston Street

Street Address

Foley

City

251-444-7000

Telephone

Baldwin

County

AL

State

251-948-2938

Fax Number

36535

Zip Code

3. Applicant has been retained personally or as a member of the above named law firm by Vanessa Williams 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 September of 2012, 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 Alabama 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:

All Courts of law (State of Alabama)	September 28, 2012
United States District Court for the Southern District of AL	October 24, 2012

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 Andrew M. Sullivan, of the Clawson and Staubes law firm, which has offices at:

126 Seven Farms Drive, Suite 200

Street Address

Charleston

County

843-577-2026

Telephone

Charleston

City

SC

State

29492

Zip Code

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).

Court of Common Pleas for the Ninth Judicial. Vanessa Williams and Vanessa Williams, as Conservator and Guardian of Sandra P. Perkins v. Bradford O. Jeffcoat, Jr., and Blue Heron Builders, LLC. Case No. 2015-CP-10-6379

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 15 day of October, 2018.

J A Wenzel
APPLICANT

VERIFICATION

STATE OF Alabama)

COUNTY OF Baldwin)

I, John Andrew Wenzel, 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.

J A Wenzel
APPLICANT/AFFIANT

Subscribed and sworn to before me this 15 day of October, 2018.

Deborah S. Rutherford

DEBORAH S. RUTHERFORD
Notary Public, Alabama State At Large
My Commission Expires 08/21/2021

Notary Public for the State of Alabama

My Commission Expires: 08/21/2021

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 22nd day of October, 2018.

[Signature]
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 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this 22nd day of October, 2018. 242

J A Wenzel
APPLICANT/AFFIANT



ALABAMA STATE BAR

415 Dexter Avenue • Post Office Box 671 • Montgomery, Alabama 36101
Telephone: 334/269-1515 • Fax: 334/261-6310
www.alabar.org

STATE OF ALABAMA

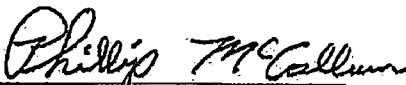
COUNTY OF MONTGOMERY

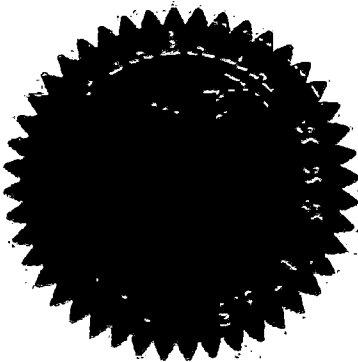
I, Phillip W. McCallum, Secretary of the Alabama State Bar and custodian of its records, hereby certify that John Andrew Wenzel has been duly admitted to the Bar of this State and is entitled to practice in all of the courts of this State including the Supreme Court of Alabama, which is the highest court of said state.

I further certify that John Andrew Wenzel was admitted to the Alabama State Bar September 28, 2012.

I further certify that the said John Andrew Wenzel is presently a member in good standing of the Alabama State Bar, having met all licensing requirements for the year ending September 30, 2019.

IN WITNESS WHEREOF, I have hereunto set my hand and the seal of the Alabama State Bar on this the 10th day of October, 2018.


Phillip W. McCallum, Secretary



LAWYERS RENDER SERVICE

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Mikell Scarborough, Master-in-Equity for Charleston County

Appellate Case No. 2018-001464

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Vanessa Williams, Vanessa Williams, as Conservator and Guardian of Sandra P. Perkins, and Vanessa Williams, as Personal Representative of the Estate of Sandra P. Perkins, Plaintiff

v.

Bradford Q. Jeffcoat Jr., and Blue Heron Builders, LLC, Defendants

Of Whom Bradford Q. Jeffcoat, Jr. is the Appellant.

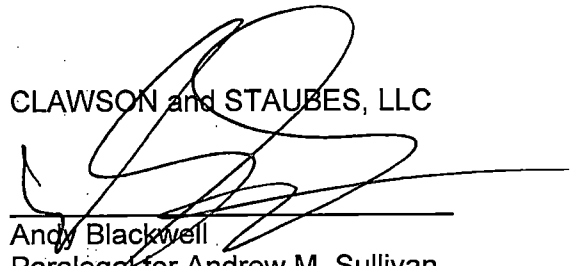
and Of Whom Vanessa Williams, Vanessa Williams, as Conservator and Guardian of Sandra P. Perkins, and Vanessa Williams, as Personal Representative of the Estate of Sandra P. Perkins is the Respondent.

Certificate of Service

I hereby certify that I have caused a copy of the Motion for Admission Pro Hac Vice in this matter to be deposited in the United States mail with postage prepaid and affixed thereto, addressed as follows, on the following: 29 day of October, 2018.

Jason Scott Luck
Garret Law Offices, LLC
1075 E. Montague Ave.
North Charleston, SC 29405

CLAWSON and STAUBES, LLC


Andy Blackwell
Paralegal for Andrew M. Sullivan
1612 Marion St, Suite 200
Columbia, SC 29201
Telephone: (843) 577-2026
Facsimile: (843) 722-2867
Attorney for Plaintiff

**CLAWSON
AND
STAUBES**
LLC

Andrew M. Sullivan
Licensed in SC
asullivan@clawsonandstaubes.com

October 29, 2018

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File No.: 20152399.000

SC Court of Appeals

Jenny Abbot Kitchings
Clerk of Court
South Carolina Court Of Appeals
PO Box 11629
Columbia, SC 29211

Re: Vanessa Williams and Vanessa Williams as Conservator and Guardian of Sandra P. Perkins vs. Bradford Q. Jeffcoat and Blue Heron Builders, LLC
Appellate Case No.: 2018-001464

Dear Ms. Kitchings:

Enclosed please find the original and one (6) copies of our Motion for Admission *Pro Hac Vice* to be filed in the above-referenced case. Please file the original and return a stamped, filed copy of the Motion in the self-addressed, stamped envelope provided for your convenience. Also enclosed is our check in the amount of Twenty-five (\$25.00) Dollars for the filing fee

By copy of this letter, I am serving a copy of the Motion for Admission *Pro Hac Vice* upon counsel of record, along with a Certificate of Service.

Very truly yours,

CLAWSON and STAUBES, LLC


Andy Blackwell

Enclosure

cc: Jason Scott Luck
Garrett Law Offices, LLC
1075 E. Montague Ave
North Charleston, SC 29405

**CLAWSON
AND STAUBES**

LLC

1612 Marion Street; Suite 200
Columbia, SC 29201
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Clerk of Court
South Carolina Court Of Appeals
PO Box 11629
Columbia, SC 29211

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