



# 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  
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November 9, 2018

**RECEIVED**

**NOV 13 2018**

**S.C. SUPREME COURT**

The Honorable Daniel E. Shearouse  
Clerk of Court  
South Carolina Supreme Court  
Post Office Box 11330  
Columbia, S.C. 29211

RE: South Carolina Community Bank v. Carolina Procurement  
Institute, Inc.  
Case No.: 2018-001653

Dear Mr. Shearouse:

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

Yours truly,

*Margaret C. McGeist*  
Deputy Clerk for Bar Admissions

MCM/st



Court:	Date Admitted:
Nevada State Court, Las Vegas County (pro hac vice)	October 2015)

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.)

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):

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):

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):

9. Local counsel of record associated with applicant in this case is Donna McQueen of the Donna McQueen, Attorney at Law <sup>G.</sup> law firm, which has offices at:

<u>PO Box 60025</u>			
<u>Street Address</u>			
<u>North Charleston</u>	<u>Charleston County</u>	<u>South Carolina</u>	<u>29419</u>
<u>City</u>	<u>County</u>	<u>State</u>	<u>Zip Code</u>
<u>843 343 2351</u>			<u>mcqueendglaw@aol.com</u>
<u>Primary Telephone</u>	<u>Cell Phone</u>	<u>Fax Number</u>	<u>Email Address</u>
<u>11282</u>			
<u>South Carolina Bar Number</u>			

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).

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 1 day of Nov, 2018

*Andreu Rodriguez*  
APPLICANT

**VERIFICATION**

STATE OF \_\_\_\_\_ )

COUNTY OF \_\_\_\_\_ )

I, Amber Robinson, 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.

Amber Robinson  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 1 day of Nov, 20 18

Cynthia Allen

Notary Public for the State of SC

My Commission Expires: 12/30-2025

**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 1 day of Nov, 20 18

Donna McQueen  
LOCAL COUNSEL OF RECORD

**CERTIFICATE OF SERVICE**

#D 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 9<sup>th</sup> day of Nov, 20 18

[Signature]  
APPLICANT/AFFIANT



# The Florida Bar

651 East Jefferson Street  
Tallahassee, FL 32399-2300

Joshua E. Doyle  
Executive Director

850/561-5600  
www.FLORIDABAR.org

State of Florida     )

County of Leon     )

In Re: 0107215  
Amber Christal Robinson  
Robinson Law Firm PLLC  
695 Central Ave Ste 264  
Saint Petersburg, Florida 33701-3669

I CERTIFY THE FOLLOWING:

I am the custodian of membership records of The Florida Bar.

Membership records of The Florida Bar indicate that The Florida Bar member listed above was admitted to practice law in the state of Florida on **October 4, 2013**.

The Florida Bar member above is an active member in good standing of The Florida Bar who is eligible to practice law in the state of Florida.

Dated this 1st day of **November, 2018**.

Pam Gerard, Manager  
Membership Records Dept.  
The Florida Bar



PG:R10  
CTM-26905

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

South Carolina Community Bank

Plaintiff,

vs.

Carolina Procurement Institute Inc., Gary A.  
Washington, Michele A. Washington, First  
Palmetto Savings Bank, F.S.B., Branch  
Banking and Trust Company, et al.,

Defendants.

IN THE COURT OF COMMON PLEAS

C/A #: 2008-CP-40-8887

**AFFIDAVIT OF STEVEN N.  
SIEGLER, FRICS, ASA**

PERSONALLY APPEARED BEFORE ME, the undersigned, who, being duly sworn,  
deposes and states as follows:

1. I am an accredited appraiser and have served as an appraisal expert witness in numerous Court cases in various jurisdictions.
2. A true and accurate copy of my CV is attached hereto and incorporated herein as Exhibit A.
3. I have been asked to consider the valuation of the property located at 1811 and 1815 Gervais Street, Columbia, South Carolina (the "Property"), the Bankruptcy proceedings relevant to this property, as well as the Federal Regulations relevant to this property and the values set by the Bank and the Court.
4. As a part of my consideration, I read the March 5, 2015 Appraisal Report of Crider, Bouye, Elliott & Goodwin, LLC, which set the value of the property on or about this date at Five Hundred Fifty Seven Thousand and no/100 (\$557,000.00) Dollars ("Crider Appraisal").

5. I found the Crider Appraisal, a true and accurate copy of which is attached hereto and incorporated herein as Exhibit B, appears to have been properly prepared in accordance with appraisal standards.

6. I also considered the March/April 2014 Appraisal of Kennedy, Watson, McKinney & Associates, Inc. which set the fair market value on this date at Four Hundred Fifty Thousand and no/100 (\$450,000.00) Dollars, a true and accurate copy of which is attached hereto and incorporate herein as Exhibit C ("Kennedy Appraisal").

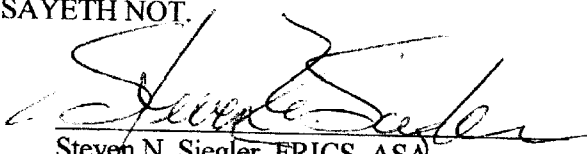
7. I found that the Kennedy Appraisal too appears to have been properly prepared in accordance with appraisal standards, although it was more dated and therefore less relevant to the fair market value of the Property.

8. I have considered the information provided to the Bankruptcy Court regarding the value of the Property in 2015 and there does not appear to be any evidence to substantiate a fair market value for the Property of Three Hundred Six Thousand Three Hundred and no/100 (\$306,300.00) Dollars.


9. Three Hundred Six Thousand Three Hundred and no/100 (\$306,300.00) Dollars does not appear to represent the value of the Property under any accepted appraisal standards.

10. Based upon the appraisals I have considered, it appears that the fair market value of the Property in 2015 greatly exceeded that found by the Bankruptcy Court, and exceeded the balance due on the loan South Carolina Community Bank foreclosed upon.

FURTHER DEPONENT SAYETH NOT.

  
Steven N. Siegler, FRICS, ASA

SWORN TO and subscribed before me  
this 19 day of February, 2016

  
Notary Public for Florida  
My Commission Expires: 11-13-18

