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March 1, 2019

Honorable Jenny Abbot Kitchings
Clerk, South Carolina Court of Appeals
Columbia, South Carolina

By fax only to (803) 734-1839

Re: In the Matter of the Estate of William D. Paradese
Appellate Case No. 2016-001960

Attn: Ms. Elizabeth Carter

Dear Ms. Kitchings:

I must apologize once more for the deficiencies of the motion filed on my behalf by my partner, James S. Murray, who is a practicing member of the South Carolina bar, to allow me to appear *pro hac vice* to argue the above case on Monday on behalf of Respondent Eleanor (Faye) Glisson. Mr. Murray bears no blame for these deficiencies, since it was my responsibility to see that the motion was properly prepared for him to sign. Upon discovering that this motion had not been filed earlier as it should have been, I found it necessary to direct its preparation remotely, being out of my office on other matters and unable to return until this morning.

I understand that the motion remains deficient in two ways: first, in that the caption number is inadequate for lack of a county identifier; and second (and more important) in that my "Verified Application for Admission Pro Hac Vice in the State of South Carolina", made to the Supreme Court and attached to the motion, is missing Exhibit "B" referenced in my response to Item 10 thereof.

As to the first point, we failed to include the Richland County Probate Court number for the case, which does appear, as we should have seen, on the briefs of both parties. I believe this is the "county identifier", the absence of which you called to my attention yesterday. I regret this error on our part, which a reference to the briefs would have made clear to my office. The number of the case in the Probate Court of Richland County was Case No. 2016-ES-40-0215. It was my responsibility to be familiar with the Court's rules and include this identifier, and I must take that responsibility and ask the Court's indulgence. I attach a new copy of the first page of the motion, now showing the correct Richland County Probate Court case number.

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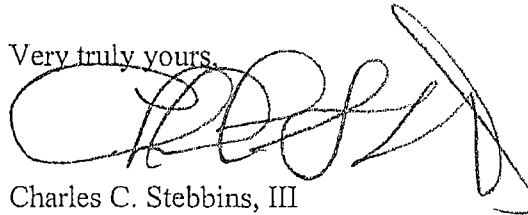
SC Court of Appeals

As to the second point, I attach "Exhibit B" as it should have been attached to my verified application in the Supreme Court, stating that this is true and correct and asking that it be accepted as being covered by my verification previously filed in the Supreme Court. I am also sending this "Exhibit B" to the Supreme Court today. In a hasty but I believe complete review, I find that I have appeared in the courts of South Carolina *pro hac vice* in six cases over my forty years of practice as a Georgia lawyer. In one case, as you will see, I was accorded the privilege of appearing before the Court of Appeals, in 2011. You will see that I have not appeared in South Carolina courts since 2014 and as I am shortly retiring I do not expect to appear again.

I am embarrassed by these errors, but I can only ask for the Court's indulgence to the extent that it considers appropriate. I would very much like to present the argument on Monday, because I was personally acquainted with the decedent and have told my client, the Respondent herein, that I will make the argument if possible. However, if the tardiness of my application and motion prevents that, then of course my South Carolina partner, Mr. Murray, will present argument on Monday. If that turns out to be the case, can I be permitted to sit within the bar of the Court, even though I would not in that case be permitted to speak?

With my continued thanks for your very kind assistance and that of your office's personnel, I am

Very truly yours,

A handwritten signature in black ink, appearing to read "C. Stebbins, III", written over the typed name below.

Charles C. Stebbins, III
Georgia Bar No. 677350

CCS/ja
Enclosures

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

) IN THE COURT OF APPEALS
)
) Appellate Case No.: 2016-001960

(Case No. 2016-ES-0215 in the
Probate Court of Richland County)

ESTATE OF WILLIAM D. PARADESES)

Plaintiff,)

v.)

GEORGANNA PARADESES,
ELEANOR GLISSON (FAYE))

Defendant.)

MOTION TO APPEAR
PRO HAC VICE

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COMES NOW James S. Murray, local counsel for Defendant, Eleanor Glisson (Faye) and petitions this Court for permission for Charles C. Stebbins, III to appear and participate in the above-styled action on behalf of Defendant Eleanor Glisson *pro hac vice* by certifying the following:

1. Attorney Charles C. Stebbins resides in Augusta, Georgia, Richmond County, is a member of the law firm of Turner Padgett Graham & Laney, P.A., with offices in Augusta, Georgia, Richmond County and has been retained to provide legal representation for the Defendant in connection with the captioned matter.

2. Attorney Charles C. Stebbins is a member in good standing of the bar of the State of Georgia and file a letter of good standing contemporaneously with this motion.

3. Local counsel of record is James S. (Jeb) Murray and has made his appearance by filing the Motion to Dismiss

EXHIBIT B TO
 VERIFIED APPLICATION FOR ADMISSION
 PRO HAC VICE
 IN THE STATE OF SOUTH CAROLINA
 As filed by Charles C. Stebbins, III
 With the Supreme Court of South Carolina
 On February 27, 2019

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<u>Case Name</u>	<u>Status</u>	<u>Date</u>	<u>Local Counsel</u>	<u>Application Status</u>
Waynetworks Threads, LLC v. Bright Future Technology, Inc.	Closed	12-13-14	James S. Murray	Accepted
U.S. National Ass'n v. Alice Crerar	Closed (related to case immed. below)	2012	James S. Murray	Accepted
ITC Commercial Funding, LLC v. Alice Crerar	Closed	1-15-10, (Court of Appeals); 12-8-09 (Aiken Co. CCP)	James S. Murray	Accepted
Construction Perfected, Inc. v. North Augusta Management Group, LLC et al.	Closed		James S. Murray	Accepted
J. Kevin Heaton v. Robert Giancroce, et al.	Closed	4-29-08	James S. Murray	Accepted
Wolfe v. Carolina Coastal Foods, Inc.	Closed	11-07-00	Richard E. Miley	Accepted
Air 1 st Aviation v. Midwest jet, et al.	Closed	9-17-98	Richard E. Miley	Accepted

FAX

Date: 03/01/2019

Pages including cover sheet: 5

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NOTE:

The Honorable Jenny Abbot Kitchings

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