

STATE OF SOUTH CAROLINA)
)
COUNTY OF CHARLESTON)

IN THE COURT OF COMMON PLEAS

Donald Stanley and Sean Reiter,)
Individually and as Class Representatives,)
)
Plaintiffs,)

C/A No. 2016-CP-10-4062

vs.

Southern States Police Benevolent)
Association, Inc.,)
)
Defendant)

RECEIVED ORDER FOR ADMISSION OF
BARRY GOHEEN
PRO HAC VICE

AUG 22 2019

SC Court of Appeals

FILED
2019 MAR 22 PM 12:01
JULIE J. ARMSTRONG
CLERK OF COURT

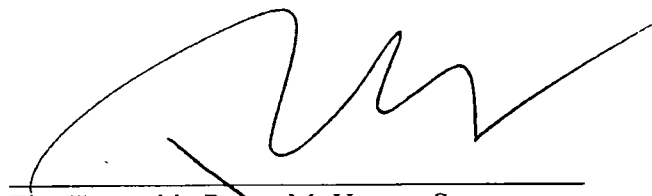
This matter came before the Court upon the motion of the Southern States Police Benevolent Association through its attorney, James Edward Bradley. The Southern States Police Benevolent Association asks that its attorney Barry Goheen be admitted *Pro Hac Vice* for the purpose of defending this lawsuit.

The Southern State Benevolent Association, Inc., has submitted a copy of the *Pro Hac Vice* application to the South Carolina Supreme Court Office of Bar Admissions pursuant to Rule 404(e) of the South Carolina Appellate Court Rules. The South Carolina Supreme Court Office of Bar Admission has certified that the application form and fee have been received as is shown by the Deputy Clerk for Bar Admissions letter.

All counsel involved in this matter have consented to this *Pro Hac Vice* admission.

IT IS THEREFORE ORDERED THAT Berry Goheen is admitted to practice *Pro Hac Vice* for the purpose of defending the Southern States Police Benevolent Association, Inc. in this lawsuit. Berry Goheen will be subject to all rules regarding conduct in South Carolina.

AND IT IS SO ORDERED.



The Honorable Roger M. Young, Sr.
Chief Judge for Administrative Purposes
9th Judicial Circuit

March 18, 2019

Charleston, South Carolina



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

August 02, 2019

Barry Goheen, Esquire
Fisher Broyles, LLP
4279 Roswell Road, Suite 208
Atlanta GA 30342

Re: Donald Stanley v. Southern State Police
Appellate Case No. 2019-000182

Dear Counsel:

We do not have a copy of a trial court order showing your admission *pro hac vice* in this case. Please provide a copy of the order within 10 days. If no order has been filed, you must file a motion for admission pursuant to Rule 404 of the South Carolina Appellate Court Rules.

Very truly yours,

V. Claire Allen, Deputy

CLERK

cc: James Edward Bradley, Esquire
Kent Taylor Stair, Esquire
John Patrick Turner Norris, Esquire
James Andrew Yoho, Esquire
Ronald L. Richter, Jr., Esquire

Scott Michael Mongillo, Esquire
Eric Steven Bland, Esquire
Andrew John Savage, III, Esquire
Carl Everette Pierce, II, Esquire
Joseph C. Wilson, IV, Esquire
Daniel Francis Lynch, IV, Esquire

March 15, 2019

The Honorable Roger M. Young, Sr.
Charleston County Judicial Center
100 Broad St., Suite 368
Charleston, SC 29401

Re: Donald Stanley and Sean Reiter, Individually and as Class Representatives
vs. Southern States Police Benevolent Association, Inc.
C/A No. 2016-CP-10-4062

Dear Judge Young:

I represent the Southern States Police Benevolent Association in this matter. With this letter I enclose motions we have filed for the *Pro Hac Vice* admission of John Anthony Love and Barry Goheen. These Motions have been sent for filing to the Clerk of Court along with the requisite fees and cover pages.

I also enclose a proposed Order granting the *Pro Hac Vice* admission for Mr. Love and Mr. Goheen.

I have discussed this matter with counsel for the Plaintiff, and counsel for the Plaintiff does not object to the admissions. In addition, as shown in the attached motions, we have filed the requisite documents with the South Carolina Supreme Court and the Court has issued the requisite letter for their *Pro Hac Vice* admission.

With this in mind, I ask that you review the proposed Orders and execute them if you find them acceptable. If for some reason you have a question or concern regarding these Orders, please have your office contact me so that I may remedy it.

Thank you for your time and consideration.

Respectfully,



James Edward Bradley

1700 Sunset Boulevard, West Columbia SC 29169 | PO Box 5709, West Columbia SC 29171

TEL 803.796.9160 FAX 803.791.8410 www.mooretaylorlaw.com

S. Jahue Moore†
J. Mark Taylor*
C. Vance Stricklin, Jr.
James Edward Bradley†
Sheila McNair Robinson
Christian G. Spradley
William H. Edwards
Stanley L. Myers
Jane H. Downey♦
S. Jahue Moore, Jr.
John C. Bradley, Jr.
Melissa K. Moore
William B. Fortino
Ralph Nichols Riley, Jr.
Amber Cary Fulmer
Lester McGill Bell, Jr.
Bryan C. Letteer
Edward Hood Dawson

Robert D. Hazel
RETIRED
Billy C. Coleman
RETIRED
C. David Sawyer, Jr.
RETIRED

The Honorable Roger M. Young, Sr.
March 15, 2019
Page 2

/crf

Enclosures

cc: John Anthony Love, Esquire (via email)
Barry Goheen, Esquire (via email)
Ronald L. Richter, Esquire (via email)
Joseph C. Wilson, IV, Esquire (via email)

August 21, 2019

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

RECEIVED
AUG 22 2019
SC Court of Appeals

Re: Donald Stanley and Sean Reiter, Individually and as Class
Representatives vs. Southern States Police Benevolent Association, Inc.
C/A No. 2016-CP-10-04062
Appellate Case No. 2019-000182

S. Jahue Moore†
J. Mark Taylor*
C. Vance Stricklin, Jr.
James Edward Bradley†
Sheila McNair Robinson
Christian G. Spradley
William H. Edwards
Stanley L. Myers
Jane H. Downey*
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William B. Fortino
Ralph Nichols Riley, Jr.
Amber Cary Fulmer
Lester McGill Bell, Jr.
Bryan C. Letteer
Edward Hood Dawson
Sierra D. Carini
Robert D. Hazel†
C. David Sawyer, Jr.†
Billy C. Coleman
1916-2019

Dear Ms. Kitchings:

As requested by V. Claire Allen, Deputy Clerk, I enclose a copy of the Order for Admission of Barry Goheen *Pro Hac Vice* including the verified application stamped as received by the Supreme Court.

In addition, I enclose Ms. Allen's letter of August 2, 2019, requesting the order for admission.

Please let me know if anything else is necessary on this matter.

Thank you for your consideration.

Sincerely,


James Edward Bradley

/lgi

Enclosures

cc: Barry Goheen, Esquire (via email)
Kent Stair, Esquire (via email)
Ronald L. Richter, Jr., Esquire (via first class mail)
Scott M. Mongillo, Esquire (via first class mail)
Eric S. Bland, Esquire (via first class mail)
Andrew J. Savage, III, Esquire (via first class mail)
Carl E. Pierce, II, Esquire (via first class mail)
Joseph C. Wilson, IV, Esquire (via first class mail)
Daniel Francis Lynch, IV, Esquire (via first class mail)

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

Donald Stanley and Sean Reiter,
Individually and as Class
Representatives

2016-CP-10-4062

The Court of Common Pleas
The Ninth Judicial Circuit

Plaintiff

Case No.

Tribunal

vs.

Mailing Address of Tribunal:

100 Broad St Ste 106
Charleston, SC 29401-2210

Southern States Police Benevolent
Association, Inc.

Defendant

RECEIVED

FEB 04 2019

Comes now Barry Goheen, applicant herein, and respectfully represents the following:

S.C. SUPREME COURT

1. Applicant resides at:

100 Mount Paran Ridge
Street Address
Atlanta Fulton GA 30327
City County State Zip Code
(404) 256-2894
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
1180 Peachtree Street, NE
Street Address
Atlanta Fulton GA 30309
City County State Zip Code
(404) 572-4618 (404) 572-5100 bgoheen@kslaw.com
Primary Telephone Cell Phone Fax Number Email Address

3. Applicant has been retained personally or as a member of the above-named law firm by

Southern States Police Benevolent Association, Inc. to provide legal representation in connection with the above case now pending before the above-named tribunal of the State of South Carolina.

4. Since November 14 of 1994, 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 Tennessee where applicant regularly practices law. Attached is a certificate of good standing dated within the last 90 days from the bar of the highest court of the District of Columbia or the State where applicant regularly practices law.

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:
State of Georgia	June 25, 1997
State of Tennessee	November 14, 1994
USDC, Middle District of GA	January 30, 2002
USDC, Northern District of GA	July 21, 1997
USDC, Northern District of IL	February 23, 2012
USDC, Southern District of IN	December 17, 2012
USDC, Middle District of TN	July 11, 1995
USDC, Western District of TN	August 28, 2017
USDC, Western District of WI	July 28, 1997
1st Circuit Court of Appeals	December 10, 2004
2nd Circuit Court of Appeals	January 28, 2009
3rd Circuit Court of Appeals	October 29, 2010
4th Circuit Court of Appeals	February 26, 2007
5th Circuit Court of Appeals	September 14, 2007
6th Circuit Court of Appeals	August 19, 1996
7th Circuit Court of Appeals	December 8, 2006
8th Circuit Court of Appeals	November 21, 2013
9th Circuit Court of Appeals	February 9, 2009
10th Circuit Court of Appeals	June 21, 2010
11th Circuit Court of Appeals	April 22, 1999

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 court or administrative body suspended or revoked, except as provided below (give particulars, e.g., date, court, administrative body, date of suspension and reinstatement):

N/A

9. Local counsel of record associated with applicant in this case is James Edward Bradley of the Moore Taylor Law Firm law firm, which has offices at:

1700 Sunset Boulevard (29169), P. O. Box 5709
 Street Address
West Columbia Lexington SC 29171

City	County	State	Zip Code
(803) 796-9160		(803) 791-8410	ward@mttlaw.com
Primary Telephone	Cell Phone	Fax Number	Email Address
66130			
South Carolina Bar Number			

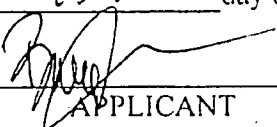
10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

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 tribunal for this case only.

DATED this 25th day of January, 20 19



APPLICANT

VERIFICATION

STATE OF GEORGIA)

COUNTY OF FULTON)

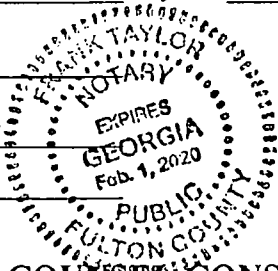
I, Barry Goheen, do hereby swear or affirm under penalty of perjury that I am the applicant in the above-styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief,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

[Signature]
APPLICANT/AFFIANT

Subscribed and sworn to before me this 25th day of January, 20 19

[Signature]
Notary Public for the State of Georgia

My Commission Expires: 2/1/20



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 25th day of January, 20 19

[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 13th day of January, 20 19

[Signature]
APPLICANT/AFFIANT

Supreme Court of Tennessee
Certificate of Good Standing

*I, James M. Hivner, Clerk of the Supreme Court of the State of Tennessee,
do hereby certify that*

Barry Goheen

*is a licensed and practicing attorney of the Courts of this State, having been
admitted to practice on November 14, 1994, and is presently in good standing.
The Supreme Court is the Court of last resort in Tennessee.*

*In testimony whereof, I have set my hand and affixed the seal of the Court on
this the 14th day of January, 2019.*

James M. Hivner
Clerk of the Supreme Court of Tennessee

By: *Kitty Martin*
Kitty Martin, D.C.



KING & SPALDING LLP

Payee: 40967 South Carolina Supreme Court

Check Date: 01/23/2019 Check #: 200103217

Invoice Date	Invoice Num	Reference	Amount
01/15/2019	01/15/2019	Fee for pro hac vice application of Barry Goheen	250.00

FOLD
HERE

FOLD
HERE

Detach at Perforation Before Depositing Check

Check Total: 250.00

THIS DOCUMENT CONTAINS SECURITY FEATURES. SEE BACK FOR DETAILS.

KING & SPALDING

1180 Peachtree Street, N.E.
Atlanta, Georgia 30309-3521

SunTrust
SunTrust Bank, Atlanta
Atlanta, Georgia

64-10610

Check Date	Check No.
01/23/2019	200103217

VOID AFTER 180 DAYS

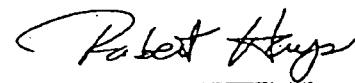
CHECK AMOUNT

\$*****250.00

PAY TWO HUNDRED FIFTY AND 00/100 dollars

Checks over \$10,000.00 require a second signature

TO THE ORDER OF South Carolina Supreme Court
Office of Bar Admissions





First Class Mail

MTI MOORE | TAYLOR
ATTORNEYS AT LAW

PO Box 5709, West Columbia SC 29171
1220 Sunset Boulevard, West Columbia SC 29169

RECEIVED

AUG 22 2019

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

