

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

R. Keith Kelly, Circuit Court Judge

Appellate Case No. 2019-001145 / Lower Case No. 2017-CP-40-00517

Jackie Eadon Chalfant,  
Individually and as Personal  
Representative of the Estate of  
Michael Dallas Chalfant,

Appellant,

v.

Carolinas Dermatology  
Group, P.A., a South Carolina  
Professional Association, and  
Mark G. Blaskis, M.D.,  
Individually.

Respondent.

**RECEIVED**


SEP 03 2019

SC Court of Appeals

**PROOF OF SERVICE**

I certify that I have served the Appellant's Notice of Filing of Lower Court's Order Granting Plaintiff's Motion For Appearance Pro Hac Vice of Michael G. Fink, a Florida Attorney dated January 5, 2018 on Carolinas Dermatology Group, P.A., a South Carolina Professional Association, and Mark G. Blaskis, M.D., Individually, by depositing a copy of it in the United States Mail, postage prepaid, on July 30, 2019, addressed to his attorney of record, Martin S. Driggers, Jr., Esq., SWEENY, WINGATE & BARROW, P.A., 115 Cargill Way, Suite B, Hartsville, South Carolina 29550 and by electronic mail to Martin S. Driggers, Esq., at [MSD@swblaw.com](mailto:MSD@swblaw.com) on August 29, 2019.

August 29, 2019

  
William Thomas Geddings, Jr., Esq.

GEDDINGS LAW FIRM, P.A.

20 Brooks Street

Manning, SC 29102

Phone: (803) 435-4770

E-mail: [wgeddings@geddingslawfirm.com](mailto:wgeddings@geddingslawfirm.com)

Attorney for Appellant

STATE OF SOUTH CAROLINA, )

COUNTY OF RICHLAND )

Jackie Eadon Chalfant, Individually, and )  
as Personal Representative of the Estate of )  
Michael Dallas Chalfant. Deceased, )

Plaintiff, )

v. )

Carolinas Dermatology Group, P. A., a )  
South Carolina Professional Association, )  
and Mark G. Blaskis, M. D., Individually, )

Defendants. )

IN THE COURT OF COMMON PLEAS

Case Number: 2017-CP-40-00517

FILED  
RICHLAND COUNTY  
JAN -5 AM 11:34

**ORDER GRANTING  
PLAINTIFF'S MOTION FOR  
APPEARANCE PRO HAC VICE**

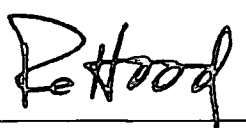

THIS CAUSE coming to be heard on the Plaintiff's Motion For Appearance Pro Hac Vice permitting Michael G. Fink, Esquire, a Florida Attorney who is not a South Carolina resident, to appear and represent the Plaintiff in conjunction with local counsel, and the Court having reviewed the Plaintiff's Motion For Appearance Pro Hac Vice, the attached Application For Admission Pro Hac Vice and the case file in this matter, and, being otherwise duly advised in the premises, IT IS

ORDERED AND ADJUDGED as follows:

1. That Plaintiff's Motion For Appearance Pro Hac Vice by Michael G. Fink, Esquire, a Florida Attorney who is not a South Carolina resident is hereby GRANTED, and Michael G. Fink, Esquire is authorized to appear and represent the Plaintiff in this action in conjunction with local counsel, William Thomas Geddings, Jr. Esquire in accordance with Rule 404, South Carolina Court Rules.

Done and Ordered in Chambers in Columbia, Richland County, South Carolina this

2 day of Jan, 2017/2018.

  
HONORABLE ALISON R. LEE   
Chief Administrative Circuit Court Judge

cc:

*Attorneys for Plaintiff*

William Thomas Geddings, Jr., Esq.  
GEDDINGS LAW FIRM, P.A.  
20 Brooks Street  
Manning, SC 29102  
Phone: (803) 435-4770  
E-mail: [wgeddings@geddingslawfirm.com](mailto:wgeddings@geddingslawfirm.com)

Michael G. Fink, Esq.  
MIKE FINK LAW FIRM, P.A.  
2029 Bayside Parkway  
Fort Myers, Florida 33901  
Phone: (239) 939-1906  
E-mail: [MFink@MikeFinkLaw.net](mailto:MFink@MikeFinkLaw.net)

*Attorney for Defendant*

William O. Sweeny, III, Esq.  
SWEENY, WINGATE, & BARROW, PA  
PO Box 12129  
Columbia, SC 29211

# Exhibit "1"

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

Jackie Eadon Chalfant, Individually, and  
as Personal Representative of the Estate of  
Michael Dallas Chalfant. Deceased,

2017-CP-40-00517

IN THE COURT OF  
COMMON PLEAS  
RICHLAND COUNTY

Plaintiff

Case No.

Court

vs.

Mailing Address of Court: \_\_\_\_\_

Carolinas Dermatology Group, P. A., a  
South Carolina Professional Association,  
and Mark G. Blaskis, M. D., Individually,

Defendant

Comes now Michael G. Fink, applicant herein, and respectfully represents the following:

1. Applicant resides at:

1332 Caloosa Vista Road

Street Address

Fort Myers

City

(239) 939-1906

Telephone

Lee

County

FL

State

33901

Zip Code

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

MIKE FINK LAW FIRM, P.A., with offices at, at

2029 Bayside Parkway

Street Address

Fort Myers

City

(239) 939-1906

Telephone

Lee

County

FL

State

(239) 939-1915

Fax Number

33901

Zip Code

2. Applicant has been retained personally or as a member of the above named law firm by  
Jackie Eadon Chalfant, Individually, and as Personal Representative of the Estate of Michael Dallas Chalfant. Deceased.

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 October of 1989, 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 Florida 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:

United States District Court for the Middle District of Florida	12/18/1989
United States District Court for the Southern District of Florida	8/12/1994

United States Court of Appeals for the Eleventh Circuit	3/11/1994
United States Court of Federal Claims	9/29/1994

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.)

United States Court of Appeals for the Eleventh Circuit

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):

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 William T. Geddings, Jr., of the Geddings law firm, which has offices at:

20 South Brooks Street

Street Address

Clarendon

County

(803) 435-4770

Telephone

Manning

City

South Carolina

State

29102

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).

2016-NI-40-00033- Case closed, Medical Malpractice case filed under 2017-CP-40-0517

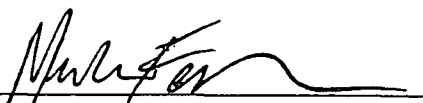
Date of Application: May 25, 2016

Local Counsel: William T. Geddings, Jr.

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 21st day of December, 2017.

  
APPLICANT

VERIFICATION

STATE OF FLORIDA)

COUNTY OF LEE)

I, MICHAEL G. FINK, 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.

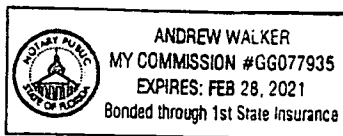
[Signature]  
APPLICANT/AFFILIANT

Subscribed and sworn to before me this 21<sup>st</sup> day of December, 2017.

[Signature]

Notary Public for the State of Florida

My Commission Expires: \_\_\_\_\_



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 21 day of Dec, 2017.

[Signature]  
LOCAL COUNSEL OF RECORD

CERTIFICATE OF SERVICE

W.Y. Geddings Jr  
SC Bar #11300

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 21<sup>st</sup> day of DECEMBER, 2017.

[Signature]  
APPLICANT/AFFILIANT



# The Florida Bar

651 East Jefferson Street  
Tallahassee, FL 32399-2300

John F. Harkness, Jr.  
Executive Director

Joshua E. Doyle  
Executive Director Designate

State of Florida )

County of Leon )

In Re: 0825743

Michael Gordon Fink  
MIKE FINK LAW FIRM, P.A.  
MIKE FINK LAW Firm, P. A. 2029 Bayside Pkwy  
Fort Myers, FL 33901-3101

## 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 19, 1989**.

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 21st day of **December, 2017**.

Pam Gerard, Manager  
Membership Records Dept.  
The Florida Bar



PG:R10  
CTM-00162

**MICHAEL G. FINK**

Mike Fink Law Firm, P.A. 2029  
Bayside Parkway  
Fort Myers, Florida 33901  
Phone: (239) 939-1906  
Fax: (239) 939-1915  
E-mail: [mfink@MikeFinkLaw.net](mailto:mfink@MikeFinkLaw.net)

**EDUCATION**

Miami Palmetto Senior High School, 1982  
Miami-Dade Community College, South Campus 1982-1983  
University of South Carolina, Columbia, SC 1986, B.S., Finance, *Cum Laude*  
University of South Carolina, Columbia, SC, School of Law, J.D. 1989.

**LEGAL EXPERIENCE**

Mike Fink Law Firm, P.A. a/k/a Mike Fink Trial Lawyers, P. A. Fort Myers, Florida  
Partner 2009 – present

- General Civil Litigation
- Commercial Litigation
- Personal Injury
- Employment Law
- Criminal Defense
- Family Law

Fink & Lane, P.A. f/k/a Fink & Boyle, P.A. f/k/a Fink, Boyle & Gentile, P.A. Ft. Myers, FL  
Managing Partner, 1994-2003 (Sold Practice)

- Outside General Counsel, First Home Builders (SWFL's Largest Builder) (1999 -2005)
- Outside General Counsel to the Lee County School Board (1994 – 1999)
- Representation of Both Plaintiff's and Defendants
- Insurance Defense – Major losses. Representative clients: Zurich (Maryland Casualty), USAA, Nationwide CMU, State Farm, Auto Owners.
- Personal Injury
- General Civil and Commercial Litigation
- Medical Malpractice Representing both Plaintiff's and Defendants
- Intellectual Property Disputes – Copyright Infringement
- Governmental Defense on behalf of Cities, Counties and School Boards, including Lee County School Board (10 years), Lee County Sheriff's Department (3 years), Lee County Emergency Medical Services (3 yrs), City of Punta Gorda, City of Cape Coral, Desoto County, Hendry County Sheriff's Dept., Charlotte County Government, etc.
- Employment Law
- Civil Rights Litigation

Fowler, White, Gillen, Boggs, Villareal & Banker, P.A. Fort Myers, Florida  
Associate, 1989-1994

- Insurance Defense Litigation on behalf of large insurance companies
- Governmental Liability/Immunity, including representation of members of SWFL Inter-Governmental Risk Management Association.
- Civil Litigation, Business and Commercial Litigation
- Outside Gen. Counsel to the Sheriff of Lee County, John McDougal (1992 – 1994)
- Outside Gen. Counsel to the Lee County School Board (1992 – 1994)
- Defense Attorney for Wal-Mart and Sam's Wholesale Club

### CERTIFICATIONS

- Florida Board Certified Civil Trial Lawyer (1991 – 2013)
- Florida Supreme Court Certified Circuit Court Mediator (2000 – Present)

### ADMITTED TO PRACTICE

- All Florida State Courts
- U.S. District Court for the Middle District of Florida (December 18, 1989)
- U.S. District Court for the Southern District of Florida (August 12, 1994)
- U.S. Court of Federal Claims (September 29, 1994)
- U.S. Circuit Court of Appeals for Eleventh Circuit (March 11, 1994)

### TEACHING POSITIONS

- Adjunct Professor of Civil Procedure, Edison Community College (1999 - 2000)
- Adjunct Professor of Torts, Florida Gulf Coast University (2013 – Present)

### SERVICE POSITIONS

- Florida Bar Grievance Committee, Vice Chair/Committee Member (2006 – 2009)
- Advisory Board Member, FGCU Department of Justice Studies (2014 – present)
- Moot Court Competition, Acting Trial Judge/Competition Judge Volunteer (2012 -2014)
- United Way Campaign Committee, Member (2003)
- Cancer Society Cattle Baron's Ball Committee Member (2004)

### SPEAKING ENGAGEMENTS

- The Briar Patch: Thorny Issues in Florida Litigation (June 2006)
- Trying the Automobile Injury Case in Florida (June 1994)
- Nationwide Insurance – Bad Faith Actions in Florida (June 1994)
- Speaker, Allstate Insurance Company, PIP Litigation (August 1991)

### HONORS AND AWARDS

- Selected as a "Go to Lawyer" "when winning is a must" by Gulfshore Life Magazine, (July 2007)
- Awarded the "Key to The City of Fort Myers" for his significant historic preservation efforts to save Fort Myers' oldest home, the "Towles Historic Home" (circa 1885) from demolition. The Towles Home is now established on the Register of National Historic Places and will be protected in perpetuity from demolition. (November 2007)
- Honorary Deputy Sheriff of Lee County, Florida (2000 – present)

### MEMBERSHIPS (PAST & CURRENT)

- Lee County Bar Association
- Florida Justice Association
- National Association of Criminal Defense Lawyers
- Caloosa Inns of Court
- Sigma Chi Fraternity Member, Former President, Social Chairman and House Manager

### PERSONAL

- Born: December 23, 1963
- Hometown: Manning, South Carolina
- Divorced with two children, Michael (16) and Sydney (14)
- Owner of First Home Title, Inc., America's largest title company (1999-2007)
- Licensed Private Pilot, Single Engine Land (July 1983 – Present)

EXHIBIT "B"

STATE OF SOUTH CAROLINA  
COUNTY OF RICHLAND  
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NUMBER: 2017CP4000517

Jackie Eadon Chalfant

Carolinas Dermatology Group P A

Michael Dallas Chalfant

South Carolina Professional Association

PLAINTIFF(S)

DEFENDANT(S)

Submitted by: _____	Attorney for : <input type="checkbox"/> Plaintiff <input type="checkbox"/> Defendant or <input type="checkbox"/> Self-Represented Litigant
---------------------	--

**DISPOSITION TYPE (CHECK ONE)**

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED (CHECK REASON):**  Rule 12(b), SCRPC;  Rule 41(a), SCRPC (Vol. Nonsuit);  
 Rule 43(k), SCRPC (Settled);  Other \_\_\_\_\_
- ACTION STRICKEN (CHECK REASON):**  Rule 40(j), SCRPC;  Bankruptcy;  
 Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;  Other \_\_\_\_\_
- STAYED DUE TO BANKRUPTCY**
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**  
 Affirmed;  Reversed;  Remanded;  Other \_\_\_\_\_

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

**IT IS ORDERED AND ADJUDGED:**  See attached order (formal order to follow)  Statement of Judgment by the Court:

**ORDER INFORMATION**

This order  ends  does not end the case. Additional Information for the Clerk : \_\_\_\_\_

**INFORMATION FOR THE JUDGMENT INDEX**

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled
		\$
		\$
		\$
If applicable, describe the property, including tax map information and address, referenced in the order:		

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time the form and final order are submitted to the judge may be provided to the clerk. Note: Title abstractors and researchers should refer to the official court order for judgment details.

Circuit Court Judge \_\_\_\_\_ Judge Code \_\_\_\_\_ Date \_\_\_\_\_

**For Clerk of Court Office Use Only**

This judgment was entered on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ and a copy mailed first class or placed in the appropriate attorney's box on this 5 day of Jan, 2018 to attorneys of record or to parties (when appearing pro se) as follows:

William T. Geddings Jr.

William O. Sweeny III

ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

Court Reporter \_\_\_\_\_

Clerk of Court [Signature]