

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

67109

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas  
Carmen T. Mullen, Circuit Court Judge

Appellate Case No. 2012-213629

RECEIVED

FEB 01 2013

COURT OF APPEALS

Carolina First Bank, Appellant,

v.

Charles S. McCue, Builder Services Group, Inc., d/b/a Gale Contractor Services,  
Pebblethorn Landscape & Design, LLC, Falco, Inc., Distinctive Granite & Marble, Inc.,  
Gustavo Angeles, individually and d/b/a Empire Construction, and Rose Hill Plantation  
Property Owners Association, Defendants,

of Whom Charles S. McCue is the Respondent.

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MOTION FOR ADMISSION OF JONATHAN E. HALPERIN *PRO HAC VICE*

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Respondent, Charles S. McCue, by and through his undersigned attorney, moves to admit Jonathan E. Halperin of the Virginia State Bar *pro hac vice* and, in support thereof, incorporates by reference the Application for Admission *Pro Hac Vice* for Mr. Halperin filed herewith.

LAUGHLIN & BOWEN, P.C.

By:

  
Drew A. Laughlin, SC Bar No. 3141  
P.O. Drawer 21119  
Hilton Head Island, SC 29925  
Ph: (843) 689-5700; Fx (843) 689-9300  
[drew.laughlin@laughlinandbowen.com](mailto:drew.laughlin@laughlinandbowen.com)

Attorney for Respondent Charles S. McCue

January 30, 2013

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

Carolina First Bank  
Plaintiff

2007-CP-07-03027  
Case No.

SC Court of Appeals  
Court

vs.

Charles S. McCue  
Defendant

Mailing Address of Court: The South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Comes now Jonathan E. Halperin, applicant herein, and respectfully represents the following:

1. Applicant resides at:

361 Anderson Mill Drive

Street Address

Bumpass

Louisa

Virginia

23024

City

County

State

Zip Code

804-402-0014

Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) The Halperin Law Center, LLC, with offices at, at

P.O. Box 356

Street Address

Oilville

Louisa

Virginia

23129

City

County

State

Zip Code

804-556-4998

Telephone

866-335-1502

Fax Number

3. Applicant has been retained personally or as a member of the above named law firm by Charles S. McCue 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 30 of 1991, 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 the Commonwealth of Virginia 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:

Court:	Date Admitted:
Commonwealth of Virginia - all courts	September 30, 1991
District of Columbia Court of Appeals - all courts	December 7, 1992
State of Maryland - all courts	June 17, 1992
US Court of Appeals for the District of Columbia	November 26, 1991
Commonwealth of Virginia Supreme Court	November 4, 1991
US District Court for the District of Columbia	August 2, 1993
US District Court for the District of Maryland	June 15, 1998

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.)

US District Court for the District of Maryland - Inactive status

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):

None

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):

None

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):

None

9. Local counsel of record associated with applicant in this case is Drew A. Laughlin, of the Laughlin & Bowen, P.C. law firm, which has offices at:

92A Main Street (Mailing - P.O. Drawer 21119)

Street Address

Beaufort

Hilton Head Island

SC

29925

County

City

State

Zip Code

843-689-5700

Telephone

If applicable list all other firms/attorneys you are associated with in this matter

None

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).

Pro Hac Vice admission granted on or about January 2, 2009 in Carolina First Bank v. Charles S. McCue, et al. in the South Carolina Fourteenth Judicial Circuit Court of Common Pleas with Case No. 2007-CP-07-03027 under Frank H. Clabaugh, Esq. of the Clabaugh Law Offices; and amended Pro Hac Vice admission granted in the same case on or about July 26, 2011 substituting new local counsel Drew A. Laughlin, Esq. of Laughlin & Bowen, P.C.

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 25<sup>th</sup> day of January, 2013.

[Signature]  
APPLICANT

**VERIFICATION**

STATE OF VIRGINIA)

COUNTY OF HENRICO)

I, Nathan Halperin, 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.

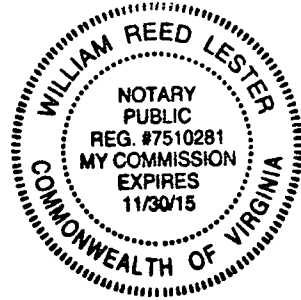
[Signature]  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 28 day of January, 2013.

[Signature]

Notary Public for the State of VA

My Commission Expires: 11/30/15



**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 30<sup>th</sup> day of JAN, 2013.

[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 30 day of JAN 2013.

[Signature]  
APPLICANT/AFFIANT

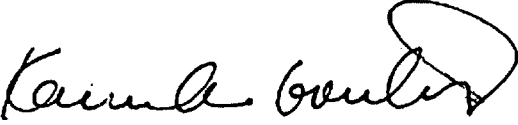


## VIRGINIA STATE BAR

### *CERTIFICATE OF GOOD STANDING*

*THIS IS TO CERTIFY THAT JONATHAN ERIC HALPERIN IS AN ACTIVE MEMBER OF THE VIRGINIA STATE BAR IN GOOD STANDING. MR. HALPERIN WAS LICENSED TO PRACTICE LAW IN VIRGINIA ON SEPTEMBER 30, 1991, AFTER SUCCESSFULLY PASSING THE BAR EXAMINATION GIVEN BY THE VIRGINIA BOARD OF BAR EXAMINERS.*

*Issued January 15, 2013*

  
KAREN A. GOULD  
EXECUTIVE DIRECTOR AND  
CHIEF OPERATING OFFICER

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM BEAUFORT COUNTY  
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Gustavo Angeles, individually and d/b/a Empire Construction, and Rose Hill Plantation  
Property Owners Association, Defendants,

of Whom Charles S. McCue is the Respondent.

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PROOF OF SERVICE

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I, Drew A. Laughlin, counsel for Respondent, Charles S. McCue, certifies that on  
this 30 day January, 2013, served the attached Motion for Admission of Jonathan E.  
Halperin *Pro Hac Vice* on counsel of record via First Class Mail, postage prepaid as  
follows:

T. William McGee, III, Esq.  
Erik T. Norton, Esq.  
Allen Mattison Bogan, Esq.  
Nelson Mullins Riley & Scarborough LLP  
P.O. Box 11070  
Columbia, SC 29211

Jonathan E. Halperin, Esq.  
Halperin Law Center  
P.O. Box 356  
Oilville, VA 23129

Mitchell Thoreson, Esq.  
John W. Wilkins, Esq.  
Alford & Wilkins, PC  
P.O. Drawer 8008  
Hilton Head Island, SC 29938

Mark S. Simpson, Esq.  
Jones Simpson & Newton, PA  
P.O. Box 1938  
Bluffton, SC 29910

Carolina First Bank v. McCue  
Appellate Case No. 2012-213629  
Proof of Service

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LAUGHLIN & BOWEN, P.C.



By:

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P.O. Drawer 21119  
Hilton Head Island, SC 29925  
Ph: (843) 689-5700; Fx (843) 689-9300  
[drew.laughlin@laughlinandbowen.com](mailto:drew.laughlin@laughlinandbowen.com)

Attorney for Respondent Charles S. McCue

**LAUGHLIN & BOWEN, P.C.**  
ATTORNEYS AT LAW  
92A Main Street  
P. O. Drawer 21119  
HILTON HEAD ISLAND, SOUTH CAROLINA 29925-1119  
www.laughlinandbowen.com

Drew A. Laughlin  
John R. C. Bowen\*  
Jennie S. Cerrati\*\*  
\*Admiralty Law  
\*\*Admitted in CA and SC

Telephone  
(843)689-5700  
Facsimile  
(843)689-9300  
Sender's E-mail  
drew.laughlin  
@laughlinandbowen.com

January 30, 2013

Jenny Abbott Kitchings, Clerk  
South Carolina Court of Appeals  
P.O. box 11629  
Columbia, SC 29211

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SC Court of Appeals

**Re: Carolina First Bank v. Charles S. McCue**  
**Appellate Case No.: 2012-213629**

Dear Ms. Kitchings:

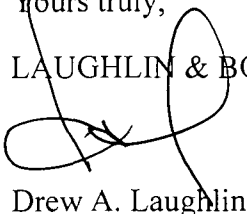
We represent Respondent Charles S. McCue in the above-referenced matter.

Enclosed please find an original and seven (7) copies of Motion for Admission of Jonathan E. Halperin *Pro Hac Vice* and Proof of Service. Please file the originals and return clocked copies to us in the enclosed self-addressed stamped envelope.

Also enclosed is our firm's check in the amount of \$25.00 for the applicable filing.

Thank you for your courtesies. If you have any questions, please do not hesitate to call me.

Yours truly,  
LAUGHLIN & BOWEN, P.C.



Drew A. Laughlin

DAL/nll

Enclosures

cc: T. William McGee, III, Esq. (with enclosures)  
Erik T. Norton, Esq. (with enclosures)  
Allen Mattison Bogan, Esq. (with enclosures)  
Mitchell Thoreson, Esq. (with enclosures)  
John W. Wilkins, Esq. (with enclosures)  
Mark S. Simpson, Esq. (with enclosures)  
Jonathan E. Halperin, Esq. (with enclosures)  
Charles S. McCue (with enclosures)

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