

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas
D. Garrison Hill, Circuit Judge

Appellate Case No. 2019-000816
Case No. 2013-CP-42-3915

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DEC 06 2019

S.C. SUPREME COURT

Angie Keene, Individually and as Personal
Representative of the Estate of Dennis Seay, Deceased,
and Linda Seay,..... Respondents,

v.

CNA Holdings, LLC..... Petitioner.

**MOTION FOR ADMISSION PRO HAC VICE OF
RICHARD C. GODFREY**

Pursuant to Rule 404 of the South Carolina Appellate Court Rules, C. Mitchell Brown, a member in good standing of the South Carolina Bar, hereby moves this Court for an Order admitting Richard C. Godfrey, Esquire to appear *pro hac vice* to practice before this Court for the sole purpose of appearing on behalf of Petitioner CNA Holdings, LLC in association with undersigned counsel in the above-captioned civil action.

In support of this Motion, the attached Verified Application for Admission *Pro Hac Vice* of Richard C. Godfrey, Esquire, which is incorporated into this motion at Exhibit 1, sets forth his qualifications for admission *pro hac vice* and his agreement to abide by the ethical standards governing the practice of law in this Court.

Respectfully submitted,

NELSON MULLINS RILEY & SCARBOROUGH LLP

C. Mitchell Brown
By: *by Blake T. Williams w/ permission*

C. Mitchell Brown

SC Bar No. 012872

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1320 Main Street / 17th Floor

Post Office Box 11070 (29211-1070)

Columbia, SC 29201

(803) 799-2000

Attorneys for Appellant CNA Holdings, LLC

Columbia, South Carolina

December 6, 2019

EXHIBIT 1

Verified Application for Admission Pro Hac Vice
of Richard C. Godfrey

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

<u>Angie Keene et al.</u> Plaintiff	<u>2019-000816</u> Case No.	<u>Supreme Court</u> Tribunal
vs.	Mailing Address of Tribunal:	<u>Supreme Court Building</u> <u>1231 Gervais Street</u> <u>Columbia, South Carolina 29201</u>
<u>CNA Holdings, LLC</u> Defendant		

Comes now Richard C. Godfrey, P.C., applicant herein, and respectfully represents the following:

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1. Applicant resides at:
623 North Euclid
Street Address
Oak Park Cook Illinois 60302
City County State Zip Code
(312) 862-2391
Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Kirkland & Ellis LLP, with offices at 300 North LaSalle
Street Address
Chicago Cook Illinois 60654
City County State Zip Code
(312)-862-2391 richard.godfrey@kirkland.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 CNA Holdings, LLC 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 Nov. 5 of 1979, 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 Illinois 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:
See attachment	

Court:	Date Admitted:

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 C. Mitchell Brown of the Nelson Mullins law firm, which has offices at:

1320 Main Street, Meridian 17th Floor

Street Address			
<u>Columbia</u>	<u>Richland</u>	<u>SC</u>	<u>29205</u>
City	County	State	Zip Code
<u>1-803-255-9595</u>		<u>1-803-255-9025</u>	<u>mitch.brown@nelsonmullins.com</u>
Primary Telephone	Cell Phone	Fax Number	Email Address
<u>12872</u>			

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).

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 2nd day of December, 2019

River C. Godfrey, P.C.
APPLICANT

VERIFICATION

STATE OF ILLINOIS)

COUNTY OF COOK)

I, Richard C. Godfrey, P.C., 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.

Richard C. Godfrey, P.C.
APPLICANT/AFFIANT

Subscribed and sworn to before me this 3rd day of December, 20 19

[Signature]

Notary Public for the State of Illinois

My Commission Expires: July 19, 2022



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 6th day of December, 2019

C. Mitchell Braun by Blake T. Willis
LOCAL COUNSEL OF RECORD *w/ permission*

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

6th day of December, 20 19

C. Mitchell Braun by Blake T. Willis
APPLICANT/AFFIANT *w/ permission*

Attachment to Verified Application of Richard C. Godfrey

Court	Date Admitted:
Supreme Court of the United States	3/27/2000
United States Court of Federal Claims	6/7/1990
United States Court of Appeals for the First Circuit	5/22/2003
United States Court of Appeals for the Second Circuit	10/17/2013
United States Court of Appeals for the Third Circuit	5/27/2003
United States Court of Appeals for the Fourth Circuit	3/10/2005
United States Court of Appeals for the Fifth Circuit	4/27/1999
United States Court of Appeals for the Sixth Circuit	8/10/1988
United States Court of Appeals for the Seventh Circuit	5/13/1983
United States Court of Appeals for the Eighth Circuit	10/18/1994
United States Court of Appeals for the Ninth Circuit	11/9/1999
United States Court of Appeals for the Tenth Circuit	8/12/1996
United States Court of Appeals for the Eleventh Circuit	2/2/2018
United States Court of Appeals for the District of Columbia Circuit	6/15/2010
United States District Court for the District of Colorado	9/20/2002
United States District Court for the Northern District of Illinois	12/13/1979
United States District Court for the Central District of Illinois	9/7/1988
United States District Court for the Northern District of Illinois Trial Bar	2/13/1987
United States District Court for the Northern District of Indiana	7/16/1999
United States District Court for the Eastern District of Michigan	11/3/2005
United States District Court for the Western District of Michigan	8/9/1990
United States Tax Court	9/25/2006

Certificate of Admission To the Bar of Illinois

I, Carolyn Taft Grosboll, Clerk of the Supreme Court of Illinois, do hereby certify that

Richard Cartier Godfrey

has been duly licensed and admitted to practice as an Attorney and Counselor at Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on 11/05/1979 and is in good standing, so far as the records of this office disclose.

IN WITNESS WHEREOF, I have hereunto
subscribed my name and affixed the
seal of said Court, this 25th day of
November, 2019.

Carolyn Taft Grosboll

Clerk,
Supreme Court of the State of Illinois



ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION
of the
SUPREME COURT OF ILLINOIS
www.iardc.org

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Fax (312) 565-2320

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Springfield, IL 62704
(217) 546-3523 (800) 252-8048
Fax (217) 546-3785

Richard C. Godfrey
Kirkland & Ellis, LLP
300 North LaSalle, Suite 3900
Chicago, IL 60654


Chicago
Tuesday, December 03, 2019

In re: Richard Cartier Godfrey
Admitted: 11/5/1979
Attorney No. 3124358

To Whom It May Concern:

The records of the Clerk of the Supreme Court of Illinois and of this office indicate that the attorney named above was admitted to the practice of law in Illinois; is currently registered on the master roll of attorneys entitled to practice law in this state; and has never been disciplined; and is in good standing.

Very truly yours,
Jerome Larkin
Administrator

By: 
Darryl R. Evans
Senior Deputy Registrar

DRE

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Angie Keene, Individually and as Personal
Representative of the Estate of Dennis Seay, Deceased,
and Linda Seay,.....

Respondents,

v.

CNA Holdings, LLC,

Petitioner.

PROOF OF SERVICE

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for CNA Holdings, LLC, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

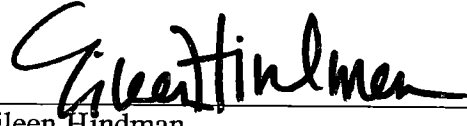
Pleadings:

**Motion for Admission Pro Hac Vice
of Richard C. Godfrey**

Counsel Served:

Theile B. McVey, Esquire
John D. Kassel, Esquire
KASSEL McVEY
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1330 Laurel Street
Columbia, SC 29201

Chris J. Panatier, Esquire
Kevin W. Paul, Esquire
SIMON GREENSTONE PANATIER
1201 Elm Street, Suite 3400
Dallas, TX 75020



Eileen Hindman
Administrative Assistant

Dec. 6, 2019