

STATE OF SOUTH CAROLINA  
COUNTY OF ORANGEBURG

) IN THE COURT OF COMMON PLEAS  
)  
) Case No.: 2015-CP-38-00354

Cortland James Eggleston,  
  
Plaintiff,  
  
vs.  
  
United Parcel Service, Inc. and Rick  
Fogle,  
  
Defendants.


MOTION IN SUPPORT OF  
PRO HAC VICE APPLICATION

2015 AUG - 11 10 53 AM '15  
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JAN 06 2020  
SC Court of Appeals

The undersigned, a member of the bar of this Court, hereby moves for special admission of Ryan Ringo Corkery of Ansa Assuncao in Philadelphia, Pennsylvania as counsel of record in this case. This Motion is based upon the showings contained in the declarations attached hereto.

The undersigned certifies that he has consulted with opposing counsel, who has no objections to this admission.

WILLSON JONES CARTER & BAXLEY, P.A.



G. Troy Thames  
421 Wando Park Boulevard, Suite 100  
Mount Pleasant, South Carolina 29464  
Phone: 843-284-0832  
Fax: 843-284-1081  
Email: [tthames@wilaw.net](mailto:tthames@wilaw.net)

Mount Pleasant, South Carolina  
June 30, 2015

ATTEST: TRUE COPY  
ATTORNEYS FOR DEFENDANTS  
UNITED PARCEL SERVICE, INC.  
AND RICK FOGLE  
Clerk of Court  
ORANGEBURG COUNTY, SC

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

Cortland James Eggleston

2015-CP-38-00354

Orangeburg County Court of  
Common Pleas

Plaintiff

Case No.

Court

vs.

United Parcel Service, Inc. and Rick Fogle  
Defendant

Mailing Address of Court: Orangeburg County Clerk of Court  
P.O. Box 9000  
Orangeburg, SC, 29116

Comes now Ryan R. Corkery, applicant herein, and respectfully represents the following:

1. Applicant resides at:

7 Chestnut Street  
Street Address  
Wayne  
City  
610-972-3136  
Telephone

Chester  
County

PA  
State

190870  
Zip Code

2015 AUG -4  
CLERK OF COURT  
ORANGEBURG COUNTY, SC

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

Assuncao, LLP, with offices at, at  
1600 JFK Boulevard, Suite 900

Street Address  
Philadelphia  
City  
267-528-0750  
Telephone

Philadelphia  
County

PA  
State  
267-528-0726  
Fax Number

19103  
Zip Code

3. Applicant has been retained personally or as a member of the above named law firm by Willson Jones  
Cart & Baxley, PA 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 November of 2005, 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 Pennsylvania 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:
Supreme Court of Pennsylvania	November 3, 2005
Supreme Court of New Jersey	December 19, 2005
United States District Court for the Eastern District of Pennsylvania	January 12, 2006
United States District Court for the Western District of Pennsylvania	March 8, 2013
District of New Jersey	February 1, 2006

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*Wingia B. Clark*  
CLERK OF COURT  
ORANGEBURG COUNTY, SC

United States District Court for the Western District of Pennsylvania	March 8, 2013
District of New Jersey	February 1, 2006

ATTEST: TRUE COPY  
*Winnia B. Clark*  
CLERK OF COURT  
CRANFORD, N.J. COUNTY CLERK

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.)

Not applicable.

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):

Not applicable.

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):

Not applicable

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):

Not applicable.

9. Local counsel of record associated with applicant in this case is G. Troy Thames, of the Willson Jones Cart & Baxley, PA law firm, which has offices at:

421 Wando Park Blvd., Suite 100

Street Address

Charleston

County

843-284-0832

Telephone

Mount Pleasant  
City

SC  
State

29464  
Zip Code

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

Not applicable.

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).

Not applicable

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 20th day of July, 2015.

ATTEST: TRUE COPY  
*Wingya B. Clark*  
CLERK OF COURT  
FRANKENBURG COUNTY

DATED this 20th day of July, 2015.

WIMBIE TRUE  
*Wimby B. Clark*  
CLERK OF COURT  
ORANGEBURG COUNTY

Ryan R. Corkery  
APPLICANT

VERIFICATION

STATE OF PENNSYLVANIA)

COUNTY OF PHILADELPHIA)

I, Ryan R. Corkery, 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.

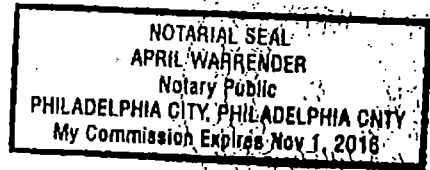
Ryan R. Corkery  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 20<sup>th</sup> day of July, 2015.

April Harrender

Notary Public for the State of Pennsylvania

My Commission Expires: November 1, 2016



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 4 day of Aug 2015.

[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 4 of Aug 2015.

Ryan R. Corkery  
APPLICANT/AFFIANT

2015 AUG -6 PM 5:50  
PHILADELPHIA, PA

ATTEST: TRUE COPY  
Wingisa B. [Signature]  
CLERK OF COURT  
PHILADELPHIA, PA



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Ryan Ringo Corkery, Esq.

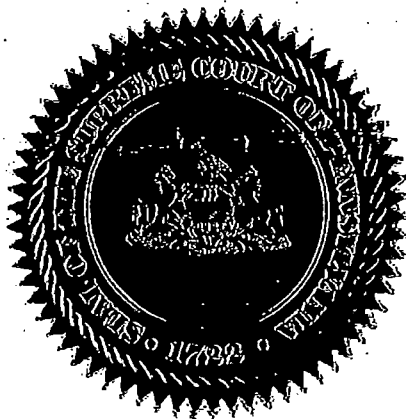
DATE OF ADMISSION

November 3, 2005

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.

2015 AUG - 6 P 12: 55

FILED  
CLERK OF COURT  
ORANBURG, SC



Witness my hand and official seal  
Dated: July 13, 2015

*Patricia A. Johnson*

Patricia A. Johnson  
Chief Clerk

*Wynne B. Clark*  
CLERK OF COURT

ORANBURG COUNTY

STATE OF SOUTH CAROLINA ) IN THE COURT OF COMMON PLEAS  
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 COUNTY OF ORANGEBURG ) Case No.: 2015-CP-38-00354  
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 Cortland James Eggleston, )  
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 Plaintiff, )  
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 vs. )  
 )  
 United Parcel Service, Inc. and Rick )  
 Fogle, )  
 )  
 Defendants. )

CERTIFICATE OF SERVICE

**RECEIVED**

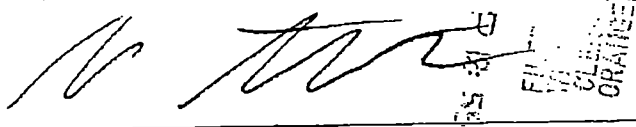
JAN 06 2020

SC Court of Appeals

I hereby certify that on this 22<sup>nd</sup> day of July, 2015 a copy of the above and foregoing *Motion In Support of Pro Hac Vice Application* has been mailed to all counsel of record, postage prepaid and properly addressed as follows:

Shane M. Burroughs  
 LANIER & BURROUGHS, LLC  
 Post Office Box 2789  
 Orangeburg, SC 29116

*Attorneys for Plaintiff*



Secretary to G. Troy Thames

2015 AUG -6 5 11 PM '15  
 FILED  
 CLERK OF COURT  
 ORANGEBURG, SC

ATTEST: TRUE COPY  
*Wingja B. Clark*  
 CLERK OF COURT  
 ORANGEBURG COUNTY, SC

# WILLSON JONES CARTER & BAXLEY, P.A.

ATTORNEYS AT LAW

GREENVILLE CHARLESTON COLUMBIA CHARLOTTE RALEIGH ATLANTA MYRTLE BEACH

G. Troy Thames  
Direct (843) 284-0832  
Fax (843) 606-3300  
tthames@wjlaw.net

421 Wando Park Boulevard  
Suite 100  
Mount Pleasant, SC 29464  
www.wjcbllaw.com

December 30, 2019

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

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JAN 06 2020  
SC Court of Appeals

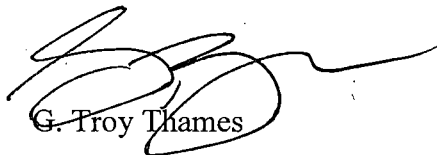
Re: Cortland James Eggleston and Rebecca McCutcheon vs. UPS & John Doe  
Appellate Case No.: 2019-002086  
WJC&B File No.: 0157.00018  
Claim No.: P505-326177

Dear Ms. Kitchings:

Enclosed please find the filed Order For Admission Pro Hac Vice of Ryan Ringo Corkery, Esquire in connection with the above-referenced matter. This document is being sent to you at the request of Ms. Ashley Thompson in your office. If you have any questions, please feel free to contact me.

With kindest regards,

WILLSON JONES CARTER & BAXLEY, P.A.



G. Troy Thames

GTT/slb

Enclosures

# WILLSON JONES CARTER & BAXLEY, P.A.

ATTORNEYS AT LAW

GREENVILLE    CHARLESTON    COLUMBIA    CHARLOTTE    RALEIGH    ATLANTA

G. Troy Thames  
Direct (843) 284-0832  
Fax (843) 284-1081  
tthames@wjlaw.net

RECEIVED  
AUG 24 2015  
By CAJ  
LC

421 Wando Park Boulevard,  
Suite 100  
Mount Pleasant, SC 29464  
www.wjclaw.net

Return to Orangeburg CEC  
August 4, 2015

Winnifa B. Clark  
Orangeburg County Clerk of Court  
P.O. Box 9000  
Orangeburg, SC 29116

Re: Courtland James Eggleston vs. UPS & Rick Fogle  
WCC File No.: 2015-CP-38-00354  
WJC&B File No.: 0157.00018

2015 AUG - 6 10 12 AM  
CLERK OF COURT  
ORANGEBURG COUNTY, SC  
CW

Dear Judge Murphy:

Enclosed please find an original and one copy of the following documents for filing with the court:

1. Verified Application for Admission *Pro Hac Vice* with attached original Certificate of Good Standing from the Pennsylvania Bar Association.
2. Motion in Support for Admission *Pro Hac Vice*.
3. Proposed Order for Admission *Pro Hac Vice*.
4. Motion Cover Sheet and \$25 filing fee.

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JAN 06 2020

SC Court of Appeals

Please file each original document and return the clocked copies to us in the self-addressed, enclosed envelope. By copy of this correspondence, we are serving counsel for the Plaintiff with the above listed documents. As well, under spate cover a courtesy copy of each document has been provided to the South Carolina Supreme Court along with the required \$250 filing fee for the Application.

Winnifa B. Clark  
CLERK OF COURT  
ORANGEBURG COUNTY, SC

With best regards,

WILLSON JONES CARTER & BAXLEY, P.A.



G. Troy Thames

GTT/les

Enclosures

cc: Mr. Shane M. Burroughs  
Ryan R. Corkery (via email)

NEOPOST FIRST CLASS MAIL  
01/02/2020  
USPS POSTAGE \$001.45  
ZIP 29454  
041110423440

WILLSON JONES CARTER & BAXLEY, P.A.  
ATTORNEYS AT LAW  
421 WANDO PARK BOULEVARD  
SUITE 100  
MOUNT PLEASANT, SC 29464

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JAN 06 2020  
SC Court of Appeals

THE HONORABLE JENNY ABBOTT KITCHINGS  
SOUTH CAROLINA COURT OF APPEALS  
P.O. BOX 11629  
COLUMBIA, SC 29211

