

EXHIBIT A

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

<u>Jimmy A. Richardson, II,</u>	<u>2020-000092</u>	<u>Supreme Court of South Carolina</u>
Plaintiff	Case No.	Tribunal
vs.		
<u>\$20,771.00, U.S. Currency,</u>	<u>Mailing Address of Tribunal:</u>	<u>Supreme Court Building</u>
<u>Travis Green</u>		<u>PO BOX 11330</u>
Defendant		<u>Columbia, SC 29211</u>

Comes now Daniel L. Alban, applicant herein, and respectfully represents the following:

1. Applicant resides at:
4407 7th St. N
 Street Address
Arlington Arlington VA 22203
 City County State Zip Code
(703) 969-5899
 Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of)
Institute for Justice, with offices at
901 N. Glebe Road, Suite 900
 Street Address
Arlington Arlington VA 22203
 City County State Zip Code
(703) 682-9320 (703) 969-5899 (703) 682-9321 dalban@jj.org
 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
Respondent Travis Green 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 Oct. 12 of 2006, 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 Virginia 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 ATTACHED LIST	

12. Applicant respectfully requests to be admitted to practice in the above-named tribunal for this case only.

DATED this 8th day of July, 2020


APPLICANT

VERIFICATION

STATE OF VIRGINIA)

COUNTY OF ARLINGTON)

I, Daniel L. Alban, 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.

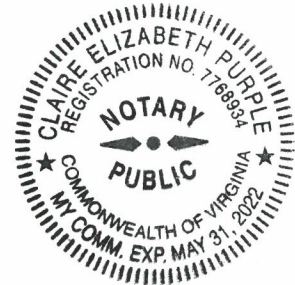
Daniel L. Alban
APPLICANT/AFFIANT

Subscribed and sworn to before me this 8th day of July, 20 20

Claire Elizabeth Purple

Notary Public for the State of Virginia

My Commission Expires: May 31, 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 8th day of July, 20 20

s/ B. Alex Hyman

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 9th day of July, 20 20

Daniel L. Alban
APPLICANT/AFFIANT

**ATTACHMENT TO VERIFIED APPLICATION FOR DANIEL ALBAN FOR
ADMISSION *PRO HAC VICE* IN THE STATE OF SOUTH CAROLINA**

Court	Admitted	Assigned Number	Status
U.S. Supreme Court	February 20, 2018	304555	Active
U.S. Court of Appeals – 7 th Circuit	May 7, 2010	N/A	Active
U.S. Court of Appeals – D.C. Circuit	February 15, 2013	54620	Active
U.S. Court of Appeals – 6 th Circuit	June 23, 2014	N/A	Active
U.S. Court of Appeals – 8 th Circuit	October 5, 2016	N/A	Active
U.S. Court of Appeals – 5 th Circuit	August 21, 2019	N/A	Active
U.S. District Court – DC	July 22, 2009	978051	Active
U.S. District Court – Eastern District of Michigan	October 25, 2013	N/A	Active
U.S. District Court – Southern District of Texas	April 23, 2018	3194997	Active
District of Columbia Bar	December 10, 2007	978051	Active
Virginia Bar	October 12, 2006	72688	Active

Supreme Court of Virginia

AT RICHMOND

Certificate

I, Douglas B. Robelen, Clerk of the Supreme Court of Virginia,
do hereby certify that

Daniel Lamar Alban

was admitted to practice as an attorney and counsellor at the bar of this Court on
October 31, 2006.

I further certify that so far as the records of this office are
concerned, Daniel Lamar Alban is a member of the bar of this Court in good
standing.

Witness my hand and seal of said Court

This 6th day of May

A.D. 2020

By: CSne
Deputy Clerk

CASEY J NASCA
STEPHEN NASCA
13253 94TH AVE N
MAPLE GROVE MN 55369

144

71-1457/712 IN
10285

7/9/20
Date

Pay to the Order of South Carolina Supreme Court \$ 250⁰⁰
two hundred & fifty dollars and ⁰⁰/₁₀₀ Dollars



Bank of America

ACH R/T 071214579

For Dan Alban PHU Application Casey Nasca MP

⑆071214579⑆

CASEY J NASCA
STEPHEN NASCA
13253 94TH AVE N
MAPLE GROVE MN 55369

145

71-1457/712 IN
10285

7/9/20
Date

Pay to the Order of South Carolina Supreme Court \$ 250⁰⁰
two hundred & fifty dollars and ⁰⁰/₁₀₀ Dollars



Bank of America

ACH R/T 071214579

For Robert Frommer PHU App. Casey Nasca MP

⑆071214579⑆

EXHIBIT B

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

<u>Jimmy A. Richardson, II,</u>	<u>2020-000092</u>	<u>Supreme Court of South Carolina</u>
Plaintiff	Case No.	Tribunal
vs.		
<u>\$20,771.00, U.S. Currency,</u>	<u>Mailing Address of Tribunal:</u>	<u>Supreme Court Building</u>
<u>Travis Green</u>		<u>PO BOX 11330</u>
Defendant		<u>Columbia, SC 29211</u>

Comes now Robert Frommer, applicant herein, and respectfully represents the following:

1. Applicant resides at:
2745 Meander Creek Lane
 Street Address
Haymarket Prince William VA 20169
 City County State Zip Code
(203) 676-9677
 Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of)
Institute for Justice, with offices at
901 N. Glebe Road, Suite 900
 Street Address
Arlington Arlington VA 22203
 City County State Zip Code
(703) 682-9320 (703) 682-9321 rfrommer@ij.org
 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
Respondent Travis Green 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 June 4, 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 Virginia 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 ATTACHED LIST	

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 B. Alex Hyman of the The Hyman Law Group, P.A. law firm, which has offices at:

1208 3rd Ave.

Street Address

Conway Horry SC 29526

City County State Zip Code

(843) 248-2024 (843) 248-3230 alex@hymanlaw.group

Primary Telephone Cell Phone Fax Number Email Address

0075416

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 8th day of July, 2020



APPLICANT

VERIFICATION

STATE OF VIRGINIA)

COUNTY OF ARLINGTON)

I, Robert Frommer, 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.



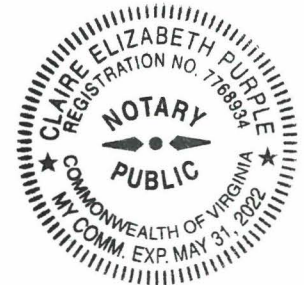
APPLICANT/AFFIANT

Subscribed and sworn to before me this 8th day of July, 20 20

Claire Elizabeth Purple

Notary Public for the State of Virginia

My Commission Expires: May 31, 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 8th day of July, 20 20

s/ B. Alex Hyman

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 9th day of July, 20 20



APPLICANT/AFFIANT

**ATTACHMENT TO VERIFIED APPLICATION FOR ROBERT FROMMER FOR
ADMISSION *PRO HAC VICE* IN THE STATE OF SOUTH CAROLINA**

Court	Admitted	Assigned Number	Status
U.S. Supreme Court	July 27, 2009	272546	Active
U.S. Court of Appeals – 4 th Circuit	February 16, 2011	N/A	Active
U.S. Court of Appeals – 8 th Circuit	March 14, 2006	N/A	Active
U.S. Court of Appeals – DC Circuit	July 15, 2009	52413	Active
U.S. District Court – DC	February 2, 2009	497308	Inactive
U.S. District Court – Eastern District of Virginia	October 29, 2010	N/A	Active
District of Columbia Bar	April 3, 2006	497308	Inactive
Virginia Bar	June 4, 2005	70086	Active

Supreme Court of Virginia

AT RICHMOND

Certificate

I, Douglas B. Robelen, Clerk of the Supreme Court of Virginia,
do hereby certify that

ROBERT PELLER FROMMER

was admitted to practice as an attorney and counsellor at the bar of this Court on
June 6, 2005.

I further certify that so far as the records of this office are
concerned, ROBERT PELLER FROMMER is a member of the bar of this
Court in good standing.

Witness my hand and seal of said Court

This 6th day of May

A.D. 2020

By: *DR*
Deputy Clerk

CASEY J NASCA
STEPHEN NASCA
13253 94TH AVE N
MAPLE GROVE MN 55369

144

71-1457/712 IN
10285

7/9/20
Date

Pay to the Order of South Carolina Supreme Court \$ 250⁰⁰
two hundred & fifty dollars and ⁰⁰/₁₀₀ Dollars



Bank of America

ACH R/T 071214579

For Dan Alban PHU Application Casey Nasca MP

⑆071214579⑆ [REDACTED]

CASEY J NASCA
STEPHEN NASCA
13253 94TH AVE N
MAPLE GROVE MN 55369

145

71-1457/712 IN
10285

7/9/20
Date

Pay to the Order of South Carolina Supreme Court \$ 250⁰⁰
two hundred & fifty dollars and ⁰⁰/₁₀₀ Dollars



Bank of America

ACH R/T 071214579

For Robert Frommer PHU App. Casey Nasca MP

⑆071214579⑆ [REDACTED]