

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

Appellate Case No. 2020-000935

AUG 05 2020

SC Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Diane S. Goodstein, Circuit Court Judge, Dorchester County
Maite Murphy, Circuit Court Judge, Dorchester County

Case No. 2018-CP-18-00729

Portfolio Recovery Associates, LLC Assignee of Synchrony Bank/HH Gregg
Respondent,

v.

Jennifer Campney, Defendant

and

Jennifer Campney, Third-party Plaintiff,

v.

Cooling & Winter, LLC, Third-party Defendant, of whom Jennifer Campney is the
Appellant.

MOTION FOR ADMISSION PRO HAC VICE

NOW COMES J. Ronald Jones, Jr. of Smith Debnam Narron Drake Saintsing & Myers, LLP, pursuant to Rule 404, SCACR, and hereby moves this court for an order granting Caren D. Enloe of Smith Debnam Narron Drake Saintsing & Myers, LLP, admission *pro hac vice* for the purpose of appearing as counsel on behalf of Respondent Portfolio Recovery Associates, LLC

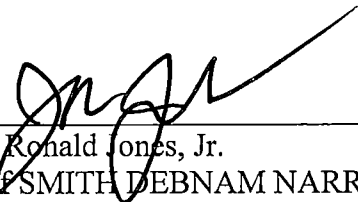
Assignee of Synchrony Bank/HH Gregg in the above-styled cause only. In support of this motion, the undersigned states:

1. The Verified Application for Admission Pro Hac Vice in the State of South Carolina of Caren D. Enloe, as required by Rule 404(d), SCACR, is attached hereto as **Exhibit A**.

2. A check in the amount of \$250.00 in payment of the filing fees required to process this motion for admission *pro hac vice* has been delivered to the Clerk of this Court.

WHEREFORE, the undersigned counsel respectfully requests that this Court enter an Order granting Caren D. Enloe admission *pro hac vice* for purposes of this cause only.

Respectfully submitted,



J. Ronald Jones, Jr.
OF SMITH DEBNAM NARRON DRAKE
SAINTSING & MYERS, LLP
SC Bar No. 5874
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Charleston, SC 29401
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Counsel for Respondent

Charleston, South Carolina

July 31, 2020

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Respondent,

v.

Jennifer Campney, Defendant

and

Jennifer Campney, Third-party Plaintiff,

v.

Cooling & Winter, LLC, Third-party Defendant, of whom Jennifer Campney is the
Appellant.

CERTIFICATE OF SERVICE

I certify that I have on this day served a copy of the foregoing **Motion for Admission Pro Hac Vice** upon all parties to this action by remitting copies of the same into sealed envelopes entrusted to the care and custody of the United States Postal Service, for mailing via first-class mail, postage prepaid, with each envelope properly addressed as follows:

John R. Cantrell, Jr.
CANTRELL LEGAL, PC
Post Office Box 1276
Goose Creek, SC 29445-1276
Attorney for Appellant

Joseph E. Brown
S. Louis Schiappa
COOLING & WINTER, LLC
220 N. Main Street, Suite 500
Greenville, SC 29601
Attorneys for Respondent

Dated this, the 3 day of ~~July~~^{August}, 2020.

Kendl Ernst

Kendl Ernst, paralegal for
J. Ronald Jones, Jr. (SC Bar # 5874)
Smith Debnam Narron Drake Saintsing & Myers,
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171 Church Street, Suite 120
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Counsel for Respondent



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August 3, 2020

VIA FIRST CLASS MAIL

South Carolina Court of Appeals
Attn: Clerk of Court
PO Box 11629
Columbia, SC 29211

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SC Court of Appeals

Re: *Portfolio Recovery Associates, LLC Assignee of Synchrony Bank/HH Gregg v. Jennifer Campney and Jennifer Campney v. Cooling & Winter, LLC*
Docket No. 2020-000935
Our File No. M80607-27

Dear Sir or Madam:

Enclosed for filing is the original and six copies of Respondent's Motion for Admission Pro Hac Vice for the above-referenced matter along with the filing fee.

Thanking you in advance for your assistance in this matter.

Sincerely,

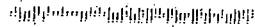
Kendl Ernst

Encl./as stated

cc: John C. Cantrell, Jr.
Joseph E. Brown
S. Louis Schiappa



SMITH DERNAM NARROW DRAKE SAINTSING & MYERS, LLP
PO Box 11629 Columbia, South Carolina 29211-0129



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