

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

**RECEIVED**

AUG 05 2020

**SC Court of Appeals**

The State of South Carolina  
Court of Appeals

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

2020-000935

Plaintiff

Case No.

Tribunal

vs.

Mailing Address of Tribunal:

PO Box 11629

Columbia, SC 29211

Jennifer Campney  
Defendant

Comes now Caren D. Enloe, applicant herein, and respectfully represents the following:

1. Applicant resides at:

5101 Currigan Court

Street Address

Fuquay Varina

Wake

NC

27526

City

County

State

Zip Code

919-250-2125

Telephone

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

Smith Debnam Narron Drake Saintsing & Myers, LLP

, with offices at

4601 Six Forks Road, Suite 400

Street Address

Raleigh

Wake

NC

27609

City

County

State

Zip Code

919-250-2000

919-810-4420

919-250-2124

cenloe@smithdebnamlaw.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

Portfolio Recovery Associates, LLC Assignee of Synchrony Bank/HH

Gregg

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 August 18 of 1990, 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

North Carolina

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.)

<b>Court:</b>	<b>Date Admitted:</b>
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Court:	Date Admitted:
United States District Court for the Eastern District of NC	9/21/1990
United States District Court for the Middle District of NC	1/25/1995
United States District Court for the Western District of NC	1/20/1995
United States Circuit Court of Appeals for the Fourth Circuit	7/13/2009
United States Supreme Court	5/2/2016

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 J. Ronald Jones, Jr. of the Smith Debnam Narron Drake Saintsing & Myers, LLP law firm, which has offices at:

171 Church Street, Suite 120C

Street Address

Charleston                      Charleston                      SC                      29401

City                                      County                                      State                                      Zip Code

843-714-2535                      rjones@smithdebnamlaw.com

Primary Telephone                      Cell Phone                      Fax Number                      Email Address

5874

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).

1. First-Citizens Bank & Trust Company v. Harold Sweatman McLeod, et al, State of South Carolina, Case No. 2015-CP-10-4304, case is currently pending, the date of application was September 6, 2016, the local counsel of record was Samuel D. Fleder, and the application was granted.
2. CNH Industrial Capital America LLC v. Able Contracting, Inc., et al., United States District Court, District of South Carolina, Case No. 9:16-cv-2520-RMG, case is currently pending, the date of the application was

July 26, 2016, local counsel of record was Samuel D. Fleder, and the application was granted.

3. Discover Bank v. Christina M. Richard, State of South Carolina, Case No. 2016-CP-32-2476, case is currently closed, the date of application was December 6, 2016, the local counsel of record was Patrick Scott Goodwyn, and the application was granted.

4. In Re: Palmetto Brush Control, LLC, United States Bankruptcy Court, District of South Carolina, Case No. 19-00514-dd, case is currently pending, the date of the application was May 16, 2019, local counsel of record was Jerry T. Myers, and the application 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 30 day of July, 2020

Carmel Ende

APPLICANT

**VERIFICATION**

STATE OF North Carolina )

COUNTY OF Wake )

I, Caren D. Enloe, 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.

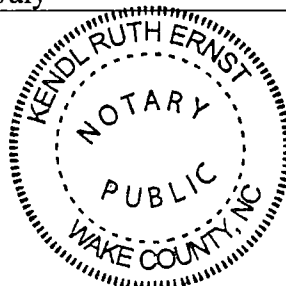
Caren D. Enloe  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 30 day of July, 20 20

Kendall Ruth Ernst

Notary Public for the State of North Carolina, County of Wake

My Commission Expires: 10/10/2023



**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 31 day of July, 20 20

[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

3 day of August, 20 20

Caren D. Enloe  
APPLICANT/AFFIANT

# Supreme Court OF THE STATE OF NORTH CAROLINA



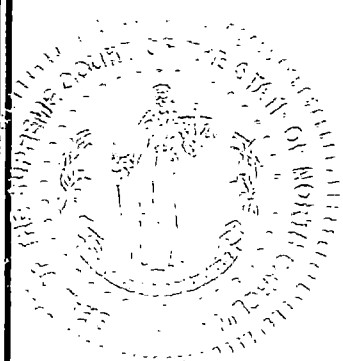
I, Amy L. Funderburk, Clerk of the Supreme Court of North Carolina, do hereby certify that on August 18, 1990, license to practice as an Attorney and Counselor at Law in all the Courts of this State was issued by the North Carolina Board of Law Examiners to

**Caren D. Enloe**

according to the certified list of licentiates reported by the Secretary of said Board and filed in my office as required by statute.

To the date of this certificate, no order revoking said license has been filed with this Court and no order suspending same is in effect.

WITNESS my hand and the Seal of the Supreme Court of North Carolina at office in Raleigh, this June 17, 2020.



*Amy L. Funderburk*

Amy L. Funderburk  
Clerk of the Supreme Court  
of the State of North Carolina



SMITH DEBNAM NARRON DRAKE SAINTSING & MYERS, LLP

Kendl Ernst  
Paralegal  
kernst@smithdebnamlaw.com  
(919) 250-2106  
Fax: (919) 250-2124

August 3, 2020

**VIA FIRST CLASS MAIL**  
South Carolina Court of Appeals  
Attn: Clerk of Court  
PO Box 11629  
Columbia, SC 29211

**RECEIVED**

**AUG 05 2020**  
**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,

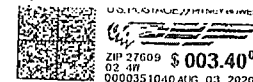
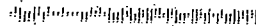
Kendl Ernst

Encl./as stated

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



SMITH DEGNAM NARRON DRAKE SAINISING & MYERS, LLP  
PO Box 11629 Columbia, North Carolina 29211-0129



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Columbia, SC 29211

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