



DUNLAEVY
LAW FIRM
EMPLOYMENT & BUSINESS LITIGATION

RECEIVED

NOV 23 2020

S.C. SUPREME COURT

November 20, 2020

BY ELECTRONIC AND U.S. MAIL

Daniel E. Shearouse
Clerk of Court
Supreme Court of South Carolina
P.O. Box 11330
Columbia, SC 29211

RE: Richardson v. Twenty Thousand Seven Hundred and Seventy-One Dollars, et. al.
Appellate Case No. 2020-000092

Dear Mr. Shearouse:

Accompanying the electronic transmission of this letter are motions for *pro hac vice* admission of Robert Daniel Alt and Jay R. Carson on behalf of my clients The Buckeye Institute and Americans For Prosperity Foundation – South Carolina.

I have mailed with this correspondence two checks, each in the amount of \$50.00, for the motion filing fee for each motion.

Please do not hesitate to contact me with any questions or if anything further is needed in connection with these filings.

Respectfully,

Jeffrey P. Dunlaevy

cc. Counsel of Record (by electronic mail)

IN THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM HORRY COUNTY
Court of Common Pleas
Steven H. John, Circuit Court Judge

Case No. 2017-CP-07411
(Appellate Case No. 2020-000092)

Jimmy A. Richardson, II, Solicitor for the 15th Judicial Circuit,
on Behalf of the 15th Judicial Circuit Drug Enforcement Unit,Appellant,

v.

Twenty Thousand Seven Hundred Seventy-One and 00/100 Dollars
(\$20,771.00), U.S. Currency and Travis Green, Respondents.

MOTION FOR *PRO HAC VICE* ADMISSION OF JAY R. CARSON

Pursuant to Rule 404 of the South Carolina Appellate Court Rules, The Buckeye Institute and Americans for Prosperity Foundation Foundation—South Carolina, who have moved to file an amici curiae brief in this matter, hereby move for *pro hac vice* admission of Jay R. Carson to represent their interests in this matter. A *pro hac vice* application has been submitted to the Office of Bar Admissions by Mr. Carson along with the required fee and certificate of good standing.

The undersigned member of the South Carolina Bar shall remain counsel of record for the moving parties and shall comply with all obligations of Rule 404(i). Concurrent with the filing of this motion, the undersigned has mailed a filing fee in the amount of \$50.00.

Date: November 20, 2020

Respectfully submitted,

s/ Jeffrey P. Dunlaevy

Jeffrey P. Dunlaevy (SC Bar No. 16978)

Dunlaevy Law Firm

37 Villa Road, Suite 440

Greenville, South Carolina 29615

Phone: (864) 208-9274

Email: jeff@dunlaevylaw.com

Counsel for Amici

IN THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM HORRY COUNTY
Court of Common Pleas
Steven H. John, Circuit Court Judge

Case No. 2017-CP-26-07411
(Appellate Case No. 2020-000092)

Jimmy A. Richardson, II, Solicitor for the 15th Judicial Circuit,
on Behalf of the 15th Judicial Circuit Drug Enforcement Unit,Appellant,

v.

Twenty Thousand Seven Hundred Seventy-One and 00/100 Dollars
(\$20,771.00), U.S. Currency and Travis Green, Respondents.

PROOF OF SERVICE

I hereby certify that on this November 20, 2020, I electronically filed the forgoing
**Motion for *Pro Hac Vice* Admission of Robert Daniel Alt and Motion for *Pro Hac Vice*
Admission of Jay R. Carson** with the South Carolina Supreme Court via email and I served
a copy via email on the following counsel.

Parties:

James R. Battle
S.C. Bar No. 73604
BATTLE LAW FIRM, LLC
PO Box 530
Conway, SC 29528
jbattle@battlelawsc.com

Alex Hyman, Esq.
Hyman Law Group
1208 Third Avenue
Conway, SC 29526
alex@hymanlaw.group

Amici:

Daniel Alban
dalban@ij.org

Robert Frommer
rfrommer@ij.org

Leon David Leggett, III
davidleggett@scag.gov

Susan K. Dunn
sdunn@aclusc.org

Shirene C. Hansotia
shansotia@aclusc.org

Jeremiah Williams
Jeremiah.Williams@ropesgray.com

Jonathan Ference-Burke
Jonathan.Ference-Burke@ropesgray.com

Caitlin E. Giaimo
Caitlin.Giaimo@ropesgray.com

Amreeta S. Mathai
amathai@aclu.org

Olga Akselrod
oakselrod@aclu.org

Rodkangyil O. Danjuma
odanjuma@aclu.org

Leah Watson
lwatson@aclu.org

Date: November 20, 2020

Respectfully submitted,

s/ Jeffrey P. Dunlaevy

Jeffrey P. Dunlaevy (SC Bar No. 16978)*

Dunlaevy Law Firm

37 Villa Road, Suite 440

Greenville, South Carolina 29615

Phone: (864) 208-9274

Email: jeff@dunlaevylaw.com

*(Counsel of Record)

IN THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM HORRY COUNTY
Court of Common Pleas
Steven H. John, Circuit Court Judge

Case No. 2017-CP-07411
(Appellate Case No. 2020-000092)

Jimmy A. Richardson, II, Solicitor for the 15th Judicial Circuit,
on Behalf of the 15th Judicial Circuit Drug Enforcement Unit,Appellant,

v.

Twenty Thousand Seven Hundred Seventy-One and 00/100 Dollars
(\$20,771.00), U.S. Currency and Travis Green, Respondents.

MOTION FOR *PRO HAC VICE* ADMISSION OF ROBERT DANIEL ALT

Pursuant to Rule 404 of the South Carolina Appellate Court Rules, The Buckeye Institute and Americans for Prosperity Foundation Foundation—South Carolina, who have moved to file an amici curiae brief in this matter, hereby move for *pro hac vice* admission of Robert Daniel Alt to represent their interests in this matter. A *pro hac vice* application has been submitted to the Office of Bar Admissions by Mr. Alt along with the required fee and certificate of good standing.

The undersigned member of the South Carolina Bar shall remain counsel of record for the moving parties and shall comply with all obligations of Rule 404(i). Concurrent with the filing of this motion, the undersigned has mailed a filing fee in the amount of \$50.00.

Date: November 20, 2020

Respectfully submitted,

s/ Jeffrey P. Dunlaevy

Jeffrey P. Dunlaevy (SC Bar No. 16978)

Dunlaevy Law Firm

37 Villa Road, Suite 440

Greenville, South Carolina 29615

Phone: (864) 208-9274

Email: jeff@dunlaevylaw.com

Counsel for Amici