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DEC 01 2020

S.C. SUPREME COURT

# The Supreme Court of South Carolina

DANIEL E. SHEAROUSE  
CLERK OF COURT

BRENDA F. SHEALY  
CHIEF DEPUTY CLERK

POST OFFICE BOX 11330  
COLUMBIA, SOUTH CAROLINA 29211  
TELEPHONE: (803) 734-1080  
FAX: (803) 734-0384

November 6, 2020

The Honorable Daniel E. Shearouse  
Clerk of Court  
South Carolina Supreme Court  
Post Office Box 11330  
Columbia, S.C. 29211

RE: Miriam Butler and Evelyn Stewart, in her capacity as personal representative of Joseph Stewart and on behalf of others similarly situated v. The Travelers Home and Marine Insurance Company, et al  
Case #: 2020-001285

Dear Mr. Shearouse:

I certify that the Office of Bar Admissions has received verified applications requesting J. Brandon McWherter, Erik D. Peterson and T. Joseph Snodgrass be admitted *pro hac vice* in the above matter. The \$250 filing fee for each applicant has been paid.

Yours truly,

*Margaret C. McGee* /st

Deputy Clerk for Bar Admissions

MCM/st

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

Miriam Butler and Evelyn Stewart  
in her capacity as personal  
representative of Joseph Stewart,  
and individually and on behalf of  
others similarly situated

Plaintiff

2020-001285

Case No.

Supreme Court of South  
Carolina

Tribunal

vs.

Mailing Address of Tribunal:

P.O. Box 11330

The Travelers Home & Marine Ins.  
Company, and The Standard Fire  
Ins. Co.

Defendant

Columbia, SC 29211

Comes now J. Brandon McWherter, applicant herein, and respectfully represents the following:

1. Applicant resides at:

6460 Penrose Drive

Street Address

Brentwood

Williamson

TN

37027

City

County

State

Zip Code

731-695-5063

Telephone

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

McWherter Scott Bobbitt PLC

, with offices at

341 Cool Springs Blvd, Suite 230

Street Address

Franklin

Williamson

TN

37067

City

County

State

Zip Code

615-354-1144

731-695-5063

731-664-1540

brandon@msb.law

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

Miriam Butler, Evelyn Stewart as personal representative of Joseph

Stewart, individually and on behalf of others similarly situated 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 November of 2001

, 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 Tennessee 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.

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S.C. SUPREME COURT

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:
TN Supreme Court and TN State Courts - Bar No. 21600	11/2001
U.S. District Court of TN Western District, Middle District, Eastern District	11/2001, 12/2003, 5/ 2012
U.S. District Court of MS Southern District; Northern District; MS State Courts - Bar No. 105244	9/2016
U.S. District Court of AR Eastern District, Western District - Bar No. 2018088	12/2016; 8/2018
Sixth Circuit Court of Appeals	2/2006
Fifth Circuit Court of Appeals	3/2019
U.S. District Court of GA Middle District, Northern District	12/2016, 7/2017

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.)

None.

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):

None.

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):

None.

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):

None.

9. Local counsel of record associated with applicant in this case is David E. Massey and Summer Tompkins of the Law Offices of David E. Massey, Trial Lawyers law firm, which has offices at:

1620 Gervais Street, Suite A  
 Street Address  
Columbia Richland SC 29202  
 City County State Zip Code  
803-799-9022 803-256-4824 803-256-4824 radmassey@aol.com;  
 Primary Telephone Cell Phone Fax Number Email Address  
Massey 3679/Tompkins 76078  
 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).

Miriam Butler, et al v Travelers, et al, before the SCSC, 10/3/2019, David E. Massey and Summer Tompkins, Granted  
Gloria Bryson, et al v Liberty Insurance Corp, et al, stayed pending SCSC decision in Butler, 8/5/2020, David E. Massey and Summer Tompkins, Granted.  
Linda Floyd, et al v Allstate Indemnity Co, et al, pending, 7/15/2020, David E. Massey and Summer Tompkins, Granted.  
Beverly Leach v Universal Ins. Co. of North America; stayed pending SCSC decision in Butler, 7/15/2020, David E. Massey and Summer Tompkins, 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 21st day of October, 2020

  
\_\_\_\_\_  
APPLICANT

VERIFICATION

STATE OF TENNESSEE )

COUNTY OF WILLIAMSON )

I, J. Brandon McWherter, 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.

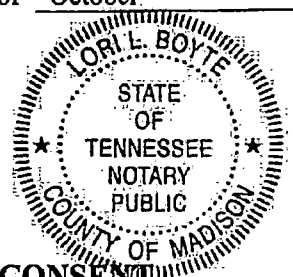
JBM-Wh  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 21st day of October, 20 20

[Signature]

Notary Public for the State of Tennessee

My Commission Expires: 10/19/2021



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 29th day of October, 20 20

s/Summer Tompkins  
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 29th day of October, 20 20

JBM-Wh  
APPLICANT/AFFIANT

*Supreme Court of Tennessee*  
*Certificate of Good Standing*

*I, James M. Hivner, Clerk of the Supreme Court of the State of Tennessee,  
do hereby certify that*

*James Brandon McWherter*

*is a licensed and practicing attorney of the Courts of this State, having been  
admitted to practice on October 31, 2001, and is presently in good standing. The  
Supreme Court is the Court of last resort in Tennessee.*

*In testimony whereof, I have set my hand and affixed the seal of the Court on  
this the 16th day of October, 2020.*

*James M. Hivner*  
*Clerk of the Supreme Court of Tennessee*

By: \_\_\_\_\_

*Adam F. Bennett, D.C.*

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

Miriam Butler, Evelyn Stewart as  
person representative of Joseph  
Stewart, individually and on behalf  
of others similarly situated,

Plaintiff

2020-001285

Case No.

Supreme Court of  
South Carolina

Tribunal

vs.

The Travelers Home & Marine Ins.  
Company and The Standard Fire Ins.  
Co.

Defendant

Mailing Address of Tribunal:

P.O. Box 11330

Columbia, SC 29211

Comes now Erik D. Peterson, applicant herein, and respectfully represents the following:

1. Applicant resides at:

723 Cramer Avenue

Street Address

Lexington

City

859-652-4999

Telephone

Fayette

County

KY

State

40502

Zip Code

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

Mehr, Fairbanks & Peterson Trial Lawyers, PLLC, with offices at

201 West Short Street, Suite 800

Street Address

Lexington

City

859-225-3731

Primary Telephone

Fayette

County

859-652-4999

Cell Phone

KY

State

859-225-3830

Fax Number

40507

Zip Code

edp@austinmehr.com

Email Address

3. Applicant has been retained personally or as a member of the above-named law firm by

Miriam Butler, Evelyn Stewart as person representative of Joseph

Stewart, individually and on behalf of others similarly situated 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 of 2009, 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

Kentucky 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.

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NOV 20 2020

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:
Kentucky Supreme Court	June 5, 2009
Supreme Court of California	July 1, 2008
US District Court, Eastern District of Kentucky	May 21, 2013
United States Court of Appeals, 9 <sup>th</sup> Circuit	March 30, 2010
US District Court, Central District of California	November 19, 2008
US District Court, Southern District of California	November 18, 2008
US District Court, Northern District of California	November 24, 2008
US District Court, Eastern District of California	November 17, 2008
United States Court of Appeals, 6 <sup>th</sup> Circuit	August 1, 2008
US District Court, Western District of Kentucky	April 15, 2013

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.)

None.

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):

None.

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):

None.

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):

None.

9. Local counsel of record associated with applicant in this case is David E. Massey and Summer Tompkins of the Law Offices of David E. Massey, Trial Lawyers law firm, which has offices at:

1620 Gervais Street, Suite A  
 Street Address  
Columbia Richland SC 29202  
 City County State Zip Code

803-799-9022  
Primary Telephone

803-256-4824  
Cell Phone

803-256-4824  
Fax Number

radmassey@aol.com;  
summertompkins2010@gmail.com  
Email Address

Massey 3679/Tompkins 76078  
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).

Mr. Peterson has sought *pro hac vice* admission in the United States District Court for the District of South Carolina:

Miriam Butler, et al. v. Travelers, et al., before the SCSC, 9/25/2019, David E. Massey and Summer Tompkins, Granted.

Gloria Bryson, et al. v. Liberty Insurance Corp., et al., stayed pending SCSC decision in Butler, 7/15/2020, David E. Massey and Summer Tompkins, Granted.

Beverly Leach v. Universal Ins. Co. of North America, stayed pending SCSC decision in Butler, 7/15/2020, David E. Massey and Summer Tompkins, Granted.

Linda Floyd, et al. v. Allstate Indemnity Company, et al., awaiting order on stay pending SCSC decision in Butler, 7/15/2020, David E. Massey and Summer Tompkins, 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 23<sup>rd</sup> day of October, 2020

s/Erik D. Peterson

APPLICANT

**VERIFICATION**

STATE OF Kentucky )

COUNTY OF Fayette )

I, Erik D. Peterson, 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.

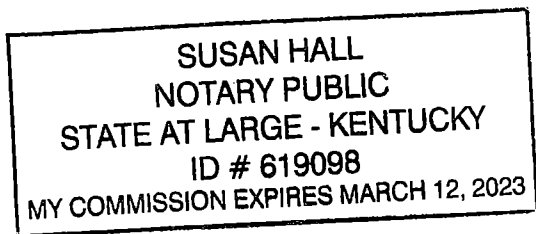
[Signature]  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 23<sup>rd</sup> day of October, 20 20

[Signature: Susan Hall]

Notary Public for the State of Kentucky, 619098

My Commission Expires: March 12, 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 29th day of October, 20 20

s/Summer Tompkins  
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 23<sup>rd</sup> day of October, 20 20

s/Erik D. Peterson  
APPLICANT/AFFIANT

# KENTUCKY BAR ASSOCIATION

514 WEST MAIN STREET  
FRANKFORT, KENTUCKY 40601-1812  
(502) 564-3795  
FAX (502) 564-3225  
[www.kybar.org](http://www.kybar.org)

**OFFICERS**  
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President

J.D. Meyer  
President-Elect

Amy D. Cabbage  
Vice President

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Immediate Past President

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Susan Montalvo-Gesser  
Susan D. Phillips  
James M. Ridings  
James A. Sigler  
Van F. Sims  
J. Tanner Watkins



*THIS IS TO CERTIFY THAT*

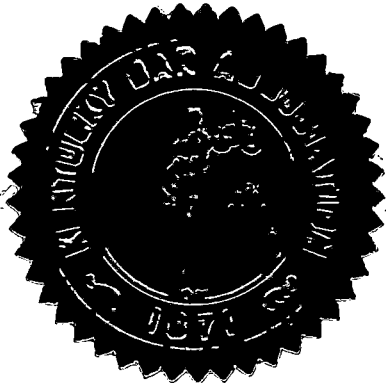
**ERIK DAVID PETERSON**

*Mehr Fairbanks Trial Lawyers  
201 West Short Street, Suite 800  
Lexington, Kentucky 40507*

*Membership No. 93003*

*is an active member in good standing with the Kentucky Bar Association as required by the  
Rules of the Supreme Court of Kentucky. Dated this 21<sup>st</sup> day of October 2020.*

**JOHN D. MEYERS**  
**REGISTRAR**



By: Michele M. Pogrotsky  
Michele M. Pogrotsky, Deputy Registrar



Kelly Stephens  
Clerk

OFFICE OF THE CLERK  
SUPREME COURT OF KENTUCKY  
ROOM 209, STATE CAPITOL  
700 CAPITAL AVE.  
FRANKFORT, KENTUCKY 40601-3488

Telephone:  
(502) 564-4720  
FAX:  
(502) 564-5491

### CERTIFICATION

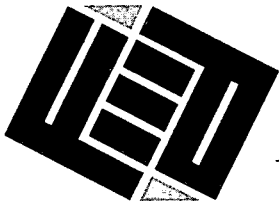
I, Kelly Stephens, Clerk of the Supreme Court of Kentucky, do hereby certify the records in this office show that Erik David Peterson having met the necessary requirements for admission to the Bar, took the oath prescribed by the Constitution of this Commonwealth on June 5, 2009, and thereupon was admitted to practice as an attorney before this and all other courts of the Commonwealth of Kentucky, and certify that Erik David Peterson is an attorney at law in good standing, as such, in all the courts of the Commonwealth.

I further certify that the Supreme Court is the Court of highest jurisdiction for the Commonwealth of Kentucky.

Done at the Capitol at Frankfort, Kentucky this 22<sup>nd</sup> day of October, 2020.

KELLY STEPHENS  
CLERK

By: Karen Cobb  
Deputy Clerk



# MEHR, FAIRBANKS & PETERSON

T R I A L      &      L A W Y E R S

201 West Short Street, Suite 800 • Lexington, Kentucky 40507 • (859) 225-3731 • Fax (859) 225-3830 • [www.mehrfairbanks.com](http://www.mehrfairbanks.com)

M. Austin Mehr  
Philip G. Fairbanks  
Erik D. Peterson  
Bartley K. Hagerman  
Elizabeth A. Thornsbury

[amehr@austinmehr.com](mailto:amehr@austinmehr.com)  
[pgf@austinmehr.com](mailto:pgf@austinmehr.com)  
[edp@austinmehr.com](mailto:edp@austinmehr.com)  
[bkh@austinmehr.com](mailto:bkh@austinmehr.com)  
[elizabeth@austinmehr.com](mailto:elizabeth@austinmehr.com)

November 16, 2020

Supreme Court of South Carolina, Clerk  
ATTN: SUNDAY  
PO Box 11330  
Columbia, SC 29211

**Re: Miriam Butler, et al. v. The Travelers Home and Marine Insurance Company  
and The Standard Fire Insurance Company – Appellate Case No. 2020-001285**

Dear Sunday:

As we discussed over the phone recently, please find enclosed the original documents for filing Pro Hac Vice Motions/Applications in the above referenced matter for:

- Erik D. Peterson
- J. Brandon McWherter
- Joe Snodgrass

Please let me know if you need anything further. I appreciate your assistance with this matter. Thank you.

Sincerely,

Susan Hall  
Paralegal

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NOV 20 2020

S.C. SUPREME COURT

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

Miriam Butler, Evelyn Stewart as  
person representative of Joseph  
Stewart, individually and on behalf  
of others similarly situated, 2020-001285 Supreme Court of  
Plaintiff Case No. South Carolina  
Tribunal

vs.

The Travelers Home & Marine Ins.  
Company and The Standard Fire Ins.  
Co. Mailing Address of Tribunal: P.O. Box 11330  
Defendant Columbia, SC 29211

Comes now T. Joseph Snodgrass, applicant herein, and respectfully represents the following:

1. Applicant resides at:  
2285 Wall Street  
Street Address  
Eagan Dakota MN 55122  
City County State Zip Code  
731-695-5063  
Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of)  
Larson King, LLP, with offices at  
30 E. Seventh Street  
Street Address  
St. Paul Ramsey MN 55101  
City County State Zip Code  
651-312-6500 651-307-3317 651-312-6618 jsnodgrass@larsonking.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  
Miriam Butler, Evelyn Stewart as person representative of Joseph  
Stewart, individually and on behalf of others similarly situated 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 October of 1992, 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  
Minnesota 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.

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S.C. SUPREME COURT

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:
Minnesota Supreme Court	10/23/1992
U.S.D. C. Minnesota	03/05/1993
U.S.D.C. Colorado	10/10/2008
U.S.D.C. North Dakota	01/07/2008
U.S.D.C. Eastern District of Arkansas	07/07/2008
U.S.D.C. Western District of Arkansas	07/07/2008
U.S.D.C. Eastern District of Wisconsin	11/11/1993
U.S.D.C. Southern District of Indiana	08/24/2017
U.S.D.C. Central District of Illinois	08/24/2017
U.S.D.C. Eastern District of Michigan	12/30/2019
Fifth Circuit Court of Appeals	11/09/2018
Seventh Circuit Court of Appeals	11/02/2012
Eighth Circuit Court of Appeals	04/07/2000
Tenth Circuit Court of Appeals	05/27/2010
U.S. Supreme Court	10/06/2014

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.)

None.

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):

None.

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):

None.

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):

None.

9. Local counsel of record associated with applicant in this case is David E. Massey and Summer Tompkins of the Law Offices of David E. Massey, Trial Lawyers law firm, which has offices at:

1620 Gervais Street, Suite A  
 Street Address  
Columbia Richland SC 29202  
 City County State Zip Code

<u>803-799-9022</u>	<u>803-256-4824</u>	<u>803-256-4824</u>	<u>radmassey@aol.com;</u>
Primary Telephone	Cell Phone	Fax Number	<u>summertompkins2010@gmail.com</u>
<u>Massey 3679/Tompkins 76078</u>			
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).

Mr. Snodgrass has sought *pro hac vice* admission in the United States District Court for the District of South Carolina:

Miriam Butler, et al. v. Travelers, et al., before the SCSC, 10/3/2019, David E. Massey and Summer Tompkins, Granted.

Gloria Bryson, et al. v. Liberty Insurance Corp., et al., stayed pending SCSC decision in Butler, 8/5/2020, David E. Massey and Summer Tompkins, Granted.

Beverly Leach v. Universal Ins. Co. of North America, stayed pending SCSC decision in Butler, 7/15/2020, David E. Massey and Summer Tompkins, 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 21<sup>st</sup> day of October, 2020

s/T. Joseph Snodgrass

APPLICANT

**VERIFICATION**

STATE OF MINNESOTA )

COUNTY OF RAMSEY )

I, T. Joseph Snodgrass, 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.

s/ T. Joseph Snodgrass  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 21<sup>st</sup> day of October, 20 20

s/Lynn A. White

Notary Public for the State of Minnesota

My Commission Expires: 01/31/25

PHYSICAL NOTARY NOT  
AVAILABLE AT TIME OF  
APPLICANT/AFFIANT SIGNATURE

**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 29th day of October, 20 20

s/ Summer Tompkins  
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 21<sup>st</sup> day of October, 20 20

s/T. Joseph Snodgrass  
APPLICANT/AFFIANT

**STATE OF MINNESOTA  
IN SUPREME COURT**

*Certificate of Good Standing*

This is to certify that the following lawyer is in good standing.

THOMAS JOSEPH SNODGRASS

was duly admitted to practice as a lawyer and counselor at law in all the courts of this state on

October 23, 1992

Given under my hand and seal of this court on

November 10, 2020

*Emily J. Eschweiler*

Emily J. Eschweiler, Director  
Office of Lawyer Registration

