

IN THE STATE OF SOUTH CAROLINA
In the Supreme Court

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S.C. 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,
Enforcement 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 LEAH M. WATSON

Pursuant to Rule 404 of the South Carolina Appellate Court Rules, the American Civil Liberties Union Foundation, American Civil Liberties Union of South Carolina Foundation, National Federation of Independent Business, the South Carolina Applesed Legal Justice Center; South Carolina for Criminal Justice Reform; Root & Rebound; and Project Not A Statistic, who have filed an amici curiae brief in support of Respondents, move for the *pro hac vice* admission of Leah M. Watson to represent them in this matter.

A *pro hac vice* application with the required fee and certificate of good standing have been submitted to the Office of Bar Admissions by Ms. Watson. A copy of the application and certificate of good standing are attached to this motion.

The undersigned members of the South Carolina Bar shall remain counsel of record for the moving amici and shall comply with all obligations of Rule 404 (i). The undersigned have mailed a filing fee in the amount of \$50.00.

Counsel for the Appellant and the Respondents have been consulted. They do not oppose this motion.

Date: December 2, 2020

Respectfully submitted,

/s/ Susan K. Dunn

SUSAN K. DUNN*

(S.C. Bar No. 1798)

SHIRENE C. HANSOTIA*

(S.C. Bar No. 100629)

ACLU of South Carolina Foundation

P.O. Box 20998

Charleston, SC 29413

Ph. 843-282-7953

sdunn@aclusc.org

Ph. 843-405-3934

shansotia@aclusc.org

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.)

Maryland State Bar: Inactive/retired

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):

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):

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):

9. Local counsel of record associated with applicant in this case is Susan Dunn of the American Civil Liberties Union Foundation of South Carolina law firm, which has offices at:

P.O. Box 20998
 Street Address
Charleston County SC Zip Code 29413
 City State
843-282-7953 Cell Phone Fax Number sdunn@aclusc.org
 Primary Telephone Email Address
1798
 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).

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 day of September, 2020

Heah Watson
APPLICANT

I am currently situated in Kings County,
New York.

VERIFICATION

STATE OF New York

COUNTY OF Kings

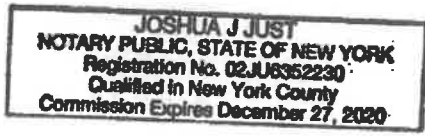
I, Leah Watson, do hereby swear or affirm under penalty of perjury that I am the applicant in the above-styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, 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 ^{remotely}sworn to before me this 21st day of September, 2020

[Signature]
Notary Public for the State of New York

My Commission Expires: 12-27-20



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 15th day of October, 2020

[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

20 day of November, 2020

[Signature]
APPLICANT/AFFIANT Susan K. Dunn



On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals,
the District of Columbia Bar does hereby certify that


Leah Monique Watson

was duly qualified and admitted on April 1, 2013 as an attorney and counselor entitled to
practice before this Court; and is, on the date indicated below, a(n)
ACTIVE member in good standing of this Bar.

**In Testimony Whereof,
I have hereunto subscribed my
name and affixed the seal of this
Court at the City of
Washington, D.C., on
September 18, 2020.**

Julio A. Castillo

**JULIO A. CASTILLO
Clerk of the Court**

Issued By: 
District of Columbia Bar Membership

For questions or concerns, please contact the D.C. Bar Membership Office at 202-626-3475 or email
memberservices@dcbbar.org.