

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)

RECEIVED

Dec 02 2020

S.C. SUPREME COURT

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 CAITLIN E. GIAIMO

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 Appleseed 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 Caitlin E. Giaimo 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. Giaimo. 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

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

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

Plaintiff

2017-CP-07411

Case No.

South Carolina Supreme Court
Tribunal

vs.

Mailing Address of Tribunal:

1231 Gervais Street
Columbia, SC 29201

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

Defendant

Comes now Caitlin E. Giaimo, applicant herein, and respectfully represents the following:

1. Applicant resides at:

124 West 60th Street

Street Address

New York

NY

NY

10023

City

County

State

Zip Code

(212) 596-9223

Telephone

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

Ropes & Gray LLP

, with offices at

1211 Avenue of the Americas

Street Address

New York

New York

NY

10036

City

County

State

Zip Code

(202) 596-9000

Primary Telephone

Cell Phone

Fax Number

Caitlin.Giaimo@ropesgray.com

Email Address

3. Applicant has been retained personally or as a member of the above-named law firm by American Civil Liberties Union Foundation, American Civil Liberties Union of South Carolina Foundation, National Federation of Independent Business, The South Carolina Appleseed Legal Justice Center, South Carolina for Criminal Justice Reform, Root & Rebound, and Project Not A Statistic 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 2nd of April 2014, 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 New York 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.)

Court:	Date Admitted:
U.S. District Court for the Southern District of New York	05/29/2015
U.S. District Court for the Eastern District of New York	05/29/2015
U.S. Supreme Court	04/29/2019

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 Susan K. Dunn of the ACLU of South Carolina Foundation law firm, which has offices at:

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

None

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 22nd day of September, 2020

Caitlin E. Giaino

APPLICANT

VERIFICATION

STATE OF NEW JERSEY)

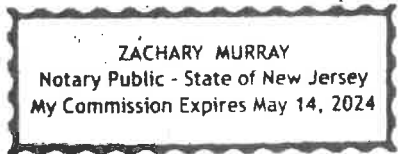
COUNTY OF BERGEN)

I, Caitlin E. Graimo, 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.

Caitlin E. Graimo
APPLICANT/AFFIANT

Subscribed and sworn to before me this 22 day of September, 20 20

[Signature]
Notary Public for the State of New Jersey
My Commission Expires: 05/14/24



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 15 day of October, 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

29th day of September, 20 20 20 day of November 2020

Caitlin E. Graimo
APPLICANT/AFFIANT

[Signature]
Susan K. Dunn



**Appellate Division of the Supreme Court
of the State of New York
Second Judicial Department**

I, **Aprilanne Agostino**, Clerk of the Appellate Division of the Supreme Court of the State of New York, Second Judicial Department, do hereby certify that **Caitlin Emily Giaino** was duly licensed and admitted to practice as an Attorney and Counselor-at-Law in all the courts of the State, according to the laws of the State and the court rules and orders, on the 2nd day of **April 2014**, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors-at-Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an Attorney and Counselor-at-Law.

In Witness Whereof, I have hereunto set my hand and affixed the seal of said Appellate Division on **September 21, 2020**.



Aprilanne Agostino

Clerk of the Court