

CK # 1214



DUNLAEVY
LAW FIRM
EMPLOYMENT & BUSINESS LITIGATION

#536
RECEIVED
NOV 13 2020
S.C. SUPREME COURT

November 9, 2020

Supreme Court of South Carolina
Office of Bar Admissions
P.O. Box 11330
Columbia, SC 29211

RE: Pro Hac Vice Application of Jay Carson

Dear Sir or Madam:

Enclosed please find the verified application for admission pro hac vice of Jay Carson. I am serving as local counsel in the matter in which Mr. Carson is seeking admission. I have also enclosed a check in the amount of \$250.

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

Respectfully,

Jeffrey P. Dunlaevy

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

Richardson, II et al. (Appellant)	Appellate Case No. 2020-000092	SUPREME COURT OF SOUTH CAROLINA
Plaintiff	Case No.	Tribunal
vs.		
Twenty Thousand Seven Hundred Seventy-One et al. (Respondents)	Mailing Address of Tribunal:	1231 Gervais Street
Defendant		PO Box 11330
		Columbia, SC 29211

Comes now Jay R. Carson, applicant herein, and respectfully represents the following:

1. Applicant resides at: 13938 Lake Road

Street Address Lakewood	Cuyahoga	Ohio	44107
City (216) 570-0256	County	State	Zip Code
Telephone			

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Wegman Hessler, with offices at 6055 Rockside Woods Blvd., Suite 200

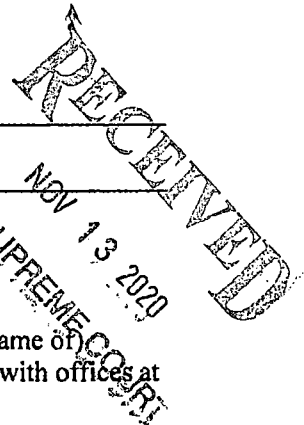
Street Address Cleveland	Cuyahoga	Ohio	44131
City (216) 642-3342	County (216) 570-0256	State (216) 642-8826	Zip Code jrcarson@wegmanlaw.com j.carson@buckeyeinstitute.org
Primary Telephone	Cell Phone	Fax Number	Email Address

3. Applicant has been retained personally or as a member of the above-named law firm by The Buckeye Institute 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 10 of 1997, 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 Ohio 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. Court of Appeals for the Sixth Circuit	July 2001
U.S. District Court for the Northern District of Ohio	December 2001
U.S. District Court for the Southern District of Ohio	November 2001



Court:	Date Admitted:
Ohio Supreme Court	November 1997
Western District of Michigan	July 2018
Northern District of New York	March 2018
Southern District of Illinois	November 2018

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.)

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 Jeffrey P. Dunlaevy of the Dunlaevy Law Firm law firm, which has offices at:

37 Villa Road, Suite 1440

Street Address Greenville	Greenville	South Carolina	29615
City 864-208-9274	County	State	Zip Code jeff@dunlaevylaw.com
Primary Telephone 16978	Cell Phone	Fax Number	Email Address

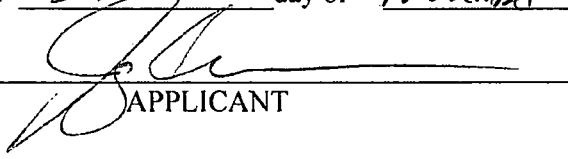
South Carolina Bar Number

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 5th day of November, 2020



APPLICANT

VERIFICATION

STATE OF Ohio

COUNTY OF Cuyahoga

I, Jay Carson, 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 9th day of November, 20 20

[Signature]



REBECCA MONTELEONE
NOTARY PUBLIC, STATE OF OHIO
My commission expires
10-5-2024

Notary Public for the State of Ohio

My Commission Expires: October 5, 2024

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 9th day of November, 20 20

[Signature]
LOCAL COUNSEL OF RECORD Jerry P. Dunlavy

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

9th day of November, 20 20

[Signature]
APPLICANT/AFFIANT



THE SUPREME COURT *of* OHIO

CERTIFICATE OF GOOD STANDING

I, GINA WHITE PALMER, Director of the Attorney Services Division of the Supreme Court of Ohio, do hereby certify that I am the custodian of the records of the Office of Attorney Services of the Supreme Court and that the Attorney Services Division is responsible for reviewing Court records to determine the status of Ohio attorneys. I further certify that, having fulfilled all of the requirements for admission to the practice of law in Ohio,

Jay Randall Carson
Attorney Registration No. 0068526

was admitted to the practice of law in Ohio on November 10, 1997; has registered as an active attorney pursuant to the Supreme Court Rules for the Government of the Bar of Ohio; is in good standing with the Supreme Court of Ohio; and is entitled to practice law in this state.



IN TESTIMONY WHEREOF, I have subscribed my name and affixed the seal of the Supreme Court, this 22nd day of September, 2020.

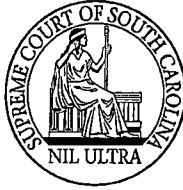
GINA WHITE PALMER
Director, Attorney Services Division

Kirstyn Podojak
Kirstyn Podojak, Attorney Services Specialist
Office of Attorney Services



No. 2020-09-22-1

Verify by email at GoodStandingRequests@sc.ohio.gov



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) 734-1499

November 23, 2020

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

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

Dear Clerk of Court:

I certify that the Office of Bar Admissions has received a verified application requesting Jay R. Carson be admitted *pro hac vice* in the above action. The \$250 filing fee for the applicant has been paid.

Yours truly,

Margaret C. McGehee
Deputy Clerk for Bar Admissions *klb*

MCM/klb