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**Jan 07 2021**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT  
Ralph King Anderson, III, Chief Administrative Law Judge

Appellate Case No. 2019-001706  
Trial Court Case No. 17-ALJ-17-0238-CC

Amazon Services, LLC ..... Appellant,

v.

South Carolina Department of Revenue ..... Respondent.

**NOTICE OF MOTION AND MOTION FOR ADMISSION *PRO HAC VICE* OF  
A. PILAR MATA**

Pursuant to Rule 404 of the South Carolina Appellate Court Rules, E. Raymond Moore, III of Murphy & Grantland, P.A. respectfully requests the Court to enter an Order permitting A. Pilar Mata to appear *pro hac vice* in this appeal as counsel for Tax Executives Institute, and would show the Court as follows:

1. A. Pilar Mata is a member in good standing of the Bar in the highest court of the District of Columbia, as well as the State of California. In addition, Ms. Mata is counsel for Tax Executives Institute.

2. Ms. Mata is handling this matter in association with E. Raymond Moore, III, who is a member in good standing of the South Carolina Bar.

3. This motion is supported by the attached Verified Application for Admission *Pro Hac Vice* of A. Pilar Mata, a copy of which has been served on the South Carolina Supreme Court Office

of Bar Admission, along with a \$250.00 check made payable to the South Carolina Supreme Court, pursuant to Rule 404 of the South Carolina Appellate Court Rules.

THEREFORE, the movant prays for an Order of this Court permitting the appearance of A. Pilar Mata, *pro hac vice* in this appeal for Tax Executives Institute.

Respectfully submitted,

*s/E. Raymond Moore, III*

E. Raymond Moore, III (SCB 11609)

Post Office Box 6648

Columbia, SC 29260

Phone: (803) 782-4100

Fax: (803) 782-4140

Email: [ermoore@murphygrantland.com](mailto:ermoore@murphygrantland.com)

*Attorney for Tax Executives Institute*

Columbia, South Carolina  
January 7, 2021

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SC Court of Appeals

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

<u>Amazon Services, LLC</u> Plaintiff	<u>Case No. 2019-001706</u> Case No.	<u>Court of Appeals</u> Tribunal
vs.		
<u>South Carolina Department of Revenue</u> Defendant	Mailing Address of Tribunal:	<u>1220 Senate Street</u> <u>Columbia, SC 29201</u>

Comes now Alicia Pilar Mata, applicant herein, and respectfully represents the following:

1. Applicant resides at:

3134 19th St NW  
Street Address  
Washington DC 20010  
City County State Zip Code  
202-464-8346  
Telephone

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

Tax Executives Institute, with offices at  
1200 G Street NW, Suite 300  
Street Address  
Washington DC 20005  
City County State Zip Code  
202-464-8346 202-368-7277 202-638-5607 pmata@tei.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

Tax Executives 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 1st day of February 2010, 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~~ Washington 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:
The Supreme Court of California	11/22/2000
The District of Columbia Court of Appeals	02/01/2010
The Supreme Court of the United States	06/15/2015

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.)

Not applicable

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):

Not applicable

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):

Not applicable

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):

Not applicable

9. Local counsel of record associated with applicant in this case is E. Ray Moore III of the Murphy & Grantland, P.A. law firm, which has offices at:

<u>4406B Forest Drive</u>			
<u>Street Address</u>			
<u>Columbia</u>	<u>Richland</u>	<u>SC</u>	<u>29206</u>
<u>City</u>	<u>County</u>	<u>State</u>	<u>Zip Code</u>
<u>803-782-4100</u>	<u>803- 960-2289</u>	<u>803-782-4140</u>	<u>ermoore@murphygrantland.com</u>
<u>Primary Telephone</u>	<u>Cell Phone</u>	<u>Fax Number</u>	<u>Email Address</u>
<u>11609</u>			
<u>South Carolina Bar Number</u>			

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).

Not applicable

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 <sup>30th</sup> ~~29th~~ <sup>(AM)</sup> day of December, 2020

Quica P. L. ...  
APPLICANT

VERIFICATION

STATE OF Washington )

COUNTY OF DC )

I, Alicia Filar Mata, 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.

Alicia Filar Mata  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 30<sup>th</sup> day of December, 20 20

Ed Wiley Shelton

Notary Public for the State of Washington DC

My Commission Expires: 05/14/2024



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 4<sup>th</sup> day of January, 20 21

Ed Wiley Shelton (Sc Bar No 11604)  
LOCAL COUNSEL OF RECORD

CERTIFICATE OF SERVICE

<sup>delivery</sup> I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by <sup>hand</sup> ~~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 4<sup>th</sup> day of January, 20 21 1231 Gervais St.

Dorothy Moore  
APPLICANT/AFFIANT



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

*Alicia Pilar Mata*

was duly qualified and admitted on February 1, 2010 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  
November 17, 2020.**

A handwritten signature in black ink that reads "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](mailto:memberservices@dcbbar.org).

January 7, 2021

**SENT VIA EMAIL WITH ATTACHMENTS TO:**

The Honorable Jenny Abbot Kitchings  
Clerk, SC Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

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**SC Court of Appeals**

RE: Amazon Services, LLC v. South Carolina Department of Revenue  
Appeal from the Administrative Law Court  
Docket No. 17-ALJ-17-0238-CC  
Appellate Case No. 2019-001706

Dear Ms. Kitchings:

Attached please find the following regarding the above-referenced case:

1. Notice of Motion and Motion for Admission Pro hac Vice of A. Pilar Mata.
2. Verified Application for Admission Pro hac Vice of A. Pilar Mata.

In accordance with the Supreme Court's March 20, 2020 (as amended May 29, 2020) regarding the Operation of the Appellate Courts During the Coronavirus Emergency, we will be mailing a check to the Court in the amount of \$50 for the filing fee required by Rule 240(d) within five days of this filing.

By copy of this correspondence, we are serving all counsel of record of the attached documents by email.

If you have any questions or concerns at this point, please do not hesitate to call.

Very truly yours,

s/E. Raymond Moore, III

E. Raymond Moore, III

ERMIII/hws

Attachment

cc: All Counsel of Record (*sent via email*)