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Apr 15 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM RICHLAND COUNTY
L. Casey Manning, Circuit Court Judge

Appellate Case No. 2021-000379
Lower Court Case No. 2021CP4001599

DEBORAH MIHAL, and the AMERICAN
CIVIL LIBERTIES UNION FOUNDATION
OF SOUTH CAROLINA,

APPELLANTS,

v.

GOVERNOR HENRY D. MCMASTER, in
His Official Capacity; and MARCIA S. ADAMS,
Executive Director of the South Carolina
Department of Administration, in Her Official
Capacity,

RESPONDENTS.

Motion for *Pro Hac Vice* Admission

Pursuant to Rule 404 of the South Carolina Appellate Court Rules, the Appellants move for the *pro hac vice* admission of Alexandra Bornstein, Brian Dimmick, Daniel Mach, Lindsey Kaley and Galen L. Sherwin to represent them in this matter.

Pro hac vice applications with the required fee of \$250.00 for each application and certificates of good standing have been submitted to the Office of Bar Admissions by Ms. Bornstein, Mr. Dimmick, Mr. Mach, Ms. Kaley and Ms. Sherwin. A copy of the applications and certificates of good standing are attached to this motion.

The undersigned members of the South Carolina Bar shall remain counsel of record for the Plaintiffs and shall comply with all obligations of Rule 404 (i). The undersigned have submitted a check in the amount of \$50.00 for the motion filing fee by mail to the Court of Appeals.

Counsel for the Defendants have been emailed a copy of this motion. Counsel for the Defendants were consulted prior to this filing. They indicate that they will not object to the admission *pro hac vice* of the above-named counsel.

Respectfully submitted,

By: /s/ Nancy Bloodgood
Nancy Bloodgood (SC Bar # 6459)
BLOODGOOD & SANDERS, LLC
242 Mathis Ferry Road, Suite 201
Mt. Pleasant, SC 29464
Phone: 843-972-0313
Email: nbloodgood@bloodgoodsanders.com

/s/ Susan K. Dunn
Susan K. Dunn (SC Bar # 1798)
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF SOUTH CAROLINA
P.O. Box 20998
Charleston, South Carolina 29413
Phone: 843-282-7953
Fax: 843-720-1428
Email: sdunn@aclusc.org

Attorneys for Appellants

Date: April 15, 2021

Apr 15 2021

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

SC Court of Appeals

Deborah Mihal et al.

2021-CP-40-1955

Richland County
Circuit Court

Plaintiff

Case No.

Tribunal

vs.

Governor Henry D. McMaster
et al.

Defendant

Mailing Address of Tribunal:

1701 Main St.
Columbia, SC 29201

Comes now Alexandra Bornstein, applicant herein, and respectfully represents the following:

1. Applicant resides at:

74 Aberry Lane

Street Address

Laconia

City

County

New Hampshire

State

03246

Zip Code

Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) American Civil Liberties Union Foundation, Inc., with offices at

125 Broad Street

Street Address

New York

City

New York

County

NY

State

10004

Zip Code

legal_ab@aclu.org

Email Address

Primary Telephone

Cell Phone

Fax Number

3. Applicant has been retained personally or as a member of the above-named law firm by Nancy Bloodgood & Susan Dunn 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 July 15 of 2019, 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:
New York Supreme Court, Appellate Division, First Judicial Department	July 15, 2019
U.S. Court of Appeals for the Ninth Circuit	May 18, 2020

12. Applicant respectfully requests to be admitted to practice in the above-named tribunal for this case only.

DATED this 2nd day of April, 2021



APPLICANT

VERIFICATION

STATE OF New Hampshire)

COUNTY OF Bellnap)

I, Alexandra Bornstein, 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 2nd day of April, 20 21

Rebecca Shosa

Notary Public for the State of New Hampshire

My Commission Expires: 8/5/2025



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 8th day of April, 20 21

Nancy Bloodgood
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

8 day of April, 20 21

Nancy Bloodgood
APPLICANT/AFFIANT



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

I, Susanna M. Rojas, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, do hereby certify that

Alexandra Susan Bornstein

was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on July 15, 2019, 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 this office, is duly registered with the Administration Office of the Courts, and according to the records of this Court is currently in good standing as an Attorney and Counselor-at-Law.

*In Witness Whereof, I have hereunto set
my hand in the City of New York on
April 1, 2021.*



Susanna M. Rojas

Clerk of the Court

Court:	Date Admitted:
D.C. Court of Appeals	5/10/13

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.)

California Supreme Court (inactive)

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 Nancy Bloodgood of the Bloodgood & Sanders, LLC law firm, which has offices at:

242 Mathis Ferry Rd., Suite 201
Street Address

Mt. Pleasant Charleston SC 29404
City County State Zip Code

843-972-0313 843-452-9342 nbloodgood@bloodgood
Primary Telephone Cell Phone Fax Number Email Address

6459 sanders.com
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 2nd day of April, 20 21

Brian L. Lummel

APPLICANT

VERIFICATION

STATE OF District of Columbia

COUNTY OF Washington

I, Brian Lawrence Dink, 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.

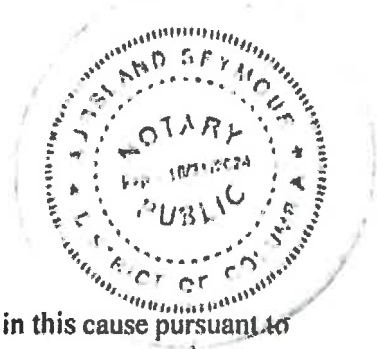
Brian Lawrence Dink
APPLICANT/AFFIANT

Subscribed and sworn to before me this 2 day of April, 20 21

Awardal Seymour

Notary Public for the State of District of Columbia

My Commission Expires: 10/31/2021



District of Columbia Notary Public
My Commission Expires Oct. 31, 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 8th day of April, 20 21

Nancy Bloodgood
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

8 day of April, 20 21

Nancy Bloodgood
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

Brian Lawrence Dimmick

was duly qualified and admitted on May 10, 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 April 1,
2021.**

Julio A. Castillo

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

Issued By:

[Signature]
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.

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

Deborah Mihal et al. 2021-CP-40-1599 Richland County Circuit Court

Plaintiff

Case No.

Tribunal

vs.

Governor Henry D. McMaster et al.

Defendant

Mailing Address of Tribunal:

1701 Main St.
Columbia, SC 29201

Comes now Daniel Mach, applicant herein, and respectfully represents the following:

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Apr 15 2021

SC Court of Appeals

1. Applicant resides at:

2914 Cleveland Ave NW

Street Address

Washington

City

(202) 675-2330

Telephone

County

DC

State

20008
Zip Code

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

American Civil Liberties Union, with offices at

915 15th Street NW

Street Address

Washington

City

(202) 675-2330

Primary Telephone

County

DC

State

20005

Zip Code

dmach@aclu.org

Email Address

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

Nancy Bloodgood & Susan Dunn 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 March 17 of 1998, 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. Supreme Court	4/16/01
U.S. Court of Appeals for D.C. Circuit	1/11/99
U.S. Court of Appeals for First Circuit	11/27/09

Court:	Date Admitted:
U.S. Court of Appeals for Second Circuit	10/14/15
U.S. Court of Appeals for Third Circuit	8/29/03
U.S. Court of Appeals for Fourth Circuit	3/12/03
(continued on Attachment 1)	

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 Nancy Bloodgood of the Bloodgood & Sanders, LLC law firm, which has offices at:

242 Mathis Ferry Rd, Suite 201

Street Address

Mt. Pleasant Charleston SC 29464

City County State Zip Code

843-972-0313 843-452-9342 n.bloodgood@bloodgood

Primary Telephone Cell Phone Fax Number Email Address

6459

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 5 day of April, 2021



APPLICANT



VERIFICATION

STATE OF District of Columbia)

COUNTY OF _____)

I, Daniel Mach, 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 2nd day of April, 20 21

[Signature]

Notary Public for the State of District of Columbia
My Commission Expires: 5/14/2022

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 8th day of April, 20 21

Nancy Bloodgood
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

8 day of April, 20 21

Nancy Bloodgood
APPLICANT/AFFIANT

Attachment 1

Court:	Date Admitted:
U.S. Court of Appeals for Fifth Circuit	7/1/08
U.S. Court of Appeals for Sixth Circuit	5/18/01
U.S. Court of Appeals for Seventh Circuit	12/11/09
U.S. Court of Appeals for Eighth Circuit	10/31/06
U.S. Court of Appeals for Ninth Circuit	2/19/04
U.S. Court of Appeals for Tenth Circuit	12/27/06
U.S. Court of Appeals for Eleventh Circuit	7/18/07
U.S. Court of Appeals for Veterans Claims	10/12/06
U.S. District Court, DDC	5/3/99
U.S. District Court, N.D. FL	8/28/08
U.S. District Court, E.D. MI	5/24/13
U.S. District Court, W.D. MI	1/13/14
U.S. District Court, CO	5/20/16
U.S. District Court, N.D. TX	12/2/16
U.S. District Court, D.N.D	1/4/17



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

I, Robert D. Mayberger, Clerk of the Appellate Division of the Supreme Court of the State of New York, Third Judicial Department, do hereby certify that

Daniel Mach

was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on March 17, 1998, 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 this office, is duly registered with the Administration Office of the Courts, and according to the records of this Court is currently in good standing as an Attorney and Counselor-at-Law.

In Witness Whereof, I have hereunto set my hand in the City of Albany on April 1, 2021.



Robert D Mayberger

Clerk of the Court



*State of New York
Supreme Court, Appellate Division
Third Judicial Department
Admissions Office
P.O. Box 7350, Capitol Station
Albany, NY 12224-0350*

*Robert D. Mayberger
Clerk of the Court*

*(518) 471-4778
fax (518) 471-4749
<http://www.nycourts.gov/ad3/admissions>*

*Timothy P. O'Keefe
Acting Director of Attorney
Admissions*

To Whom It May Concern

An attorney admitted to practice by this Court may request a certificate of good standing, which is the only official document this Court issues certifying to an attorney's admission and good standing.

An attorney's registration status, date of admission and disciplinary history may be viewed through the attorney search feature on [the website of the Unified Court System](#).

New York State does not register attorneys as active or inactive.

An attorney may request a disciplinary history letter from the [Attorney Grievance Committee of the Third Judicial Department](#).

Bar examination history is available from the [New York State Board of Law Examiners](#).

Instructions, forms and links are available on [this Court's website](#).

Robert D. Mayberger
Clerk of the Court

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

Deborah Mihal et al. 2021-CP-40-1599 Richland County
 Plaintiff Case No. Tribunal Circuit Ct
 vs. Governor Henry D. McMaster Mailing Address of Tribunal: 1701 Main St.
 Defendant et al. Columbia, SC 29201

Comes now Lindsey Kaley, applicant herein, and respectfully represents the following:

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1. Applicant resides at:
195 Hawthorne Street, Apt. 1N

Street Address Brooklyn Kings County New York 11225
 City County State Zip Code
(347) 306-4771
 Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) American Civil Liberties Union Foundation, Inc., with offices at 125 Broad Street

Street Address New York New York New York 10004
 City County State Zip Code
(212) 519-7823 (347) 306-4771
 Primary Telephone Cell Phone Fax Number Email Address lkaley@aclu.org

3. Applicant has been retained personally or as a member of the above-named law firm by Nancy Bloodgood & Susan Dunn 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 January 22 of 2015, 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. Court of Appeals for the Second Circuit	February 3, 2020
U.S. Court of Appeals for the Fifth Circuit	February 3, 2020
U.S. Court of Appeals for the Tenth Circuit	February 27, 2020

Court:	Date Admitted:
U.S. District Court for the Northern District of Texas	February 26, 2019
U.S. District Court for the Southern District of New York	June 17, 2019
NY Supreme Court, Appellate Division, Third Judicial Dept.	January 22, 2015

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 Nancy Bloodgood of the Bloodgood & Sanders, LLC law firm, which has offices at:

242 Mathis Ferry Road, Suite 201
 Street Address
Mt. Pleasant Charleston SC 29464
 City County State Zip Code
843-972-0313 843-452-9342 nbloodgood@bloodgood
 Primary Telephone Cell Phone Fax Number Email Address
6459 sanders.com
 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 3rd day of April, 2021

Andrew Caley
APPLICANT

VERIFICATION

STATE OF New York)

COUNTY OF Kings)

I, Lindsey Kaley, 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.

Lindsey Kaley
APPLICANT/AFFIANT

Subscribed and sworn to before me this 03 day of April, 20 21

[Signature]

Notary Public for the State of New York
My Commission Expires: 02/16/2025

SHENICE CHARLES
NOTARY PUBLIC, STATE OF NEW YORK
01CH6414253
QUALIFIED IN NEW YORK COUNTY
COMMISSION EXPIRES FEBRUARY 16, 2025

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 8th day of April, 20 21

Nancy Bloodgood
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

8th day of April, 20 21

Nancy Bloodgood
APPLICANT/AFFIANT



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

*I, Robert D. Mayberger, Clerk of the Appellate Division of
the Supreme Court of the State of New York, Third Judicial
Department, do hereby certify that*

Lindsey Breton Kaley

*was duly licensed and admitted to practice as an Attorney and
Counselor at Law in all the courts of this State on January 22, 2015,
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 this office, is duly registered with the Administration
Office of the Courts, and according to the records of this Court is
currently in good standing as an Attorney and Counselor-at-Law.*

*In Witness Whereof, I have hereunto set
my hand in the City of Albany on
March 31, 2021.*



Robert D Mayberger

Clerk of the Court

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

*Deborah Mihal and
The American Civil Liberties
Union Foundation of S.C.*

Plaintiff

2021-CP-40-1599

Case No.

*Richland County
Circuit Court*

Tribunal

vs.

*Governor Henry D. McMaster
and Marcia S. Adams in their
official capacities*

Defendant

Mailing Address of Tribunal:

*1701 Main St.
Columbia, SC 29201*

Comes now Galen L. Sherwin, applicant herein, and respectfully represents the following:

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SC Court of Appeals

1. Applicant resides at:
466 13th Street

Street Address
Brooklyn

Kings County

New York

11215

City
(646) 391-5436

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) American Civil Liberties Union Foundation, Inc., with offices at 125 Broad Street

Street Address

New York

New York

New York

10004

City
(212) 519-7819

County
(646) 391-5436

State

Zip Code
gsherwin@aclu.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 Nancy Bloodgood & Susan K. Dunn 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 May 10 of 2004, 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:
New York Appellate Division, First Judicial Dept.	05/10/2004
U.S. Court of Appeals for the Second Circuit	07/25/2006
U.S. Court of Appeals for the Fourth Circuit	04/07/2017

Court:	Date Admitted:
U.S. Court of Appeals for the Fifth Circuit	08/20/2010 (inactive)
U.S. Court of Appeals for the Eighth Circuit	10/05/2016
U.S. Court of Appeals for the Tenth Circuit	06/13/2005
U.S. Court of Appeals for the Eleventh Circuit	07/13/2017

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.)

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 Nancy Bloodgood of the Bloodgood Sanders, LLC law firm, which has offices at:

242 Mathis Ferry Road, Suite 201
 Street Address
Mt. Pleasant Charleston SC 29464
 City County State Zip Code
843-972-0313 843-452-9342 n/a nbloodgood@bloodgood
 Primary Telephone Cell Phone Fax Number Email Address
6459 sanders.com
 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.

LIST OF BAR ADMISSIONS (CONTINUED)

Name of State or Federal Bar or Court	Date admitted
U.S. District Court for the Southern District of New York	02/14/2005
U.S. District Court for the District of Colorado	12/04/2014
U.S. District Court for the Eastern District of New York	02/15/2005
U.S. Supreme Court	01/25/2021

12. Applicant respectfully requests to be admitted to practice in the above-named tribunal for this case only.

DATED this 1st day of April, 2021



APPLICANT

VERIFICATION

STATE OF Massachusetts)

COUNTY OF Berkshire)

I, Galen Leigh Sherwin, 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.

Galen Leigh Sherwin
APPLICANT/AFFIANT

Subscribed and sworn to before me this 1st day of April, 20 21

Caitlin E Wehry
Caitlin E Wehry

Notary Public for the State of Massachusetts

My Commission Expires: 10.7.2027



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 7th day of April, 20 21

Nancy Bloodgood
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

8 day of April, 20 21

Nancy Bloodgood
APPLICANT/AFFIANT



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

I, Susanna M. Rojas, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, do hereby certify that

Galen Leigh Sherwin

*was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on **May 10, 2004**, 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 this office, is duly registered with the Administration Office of the Courts, and according to the records of this Court is currently in good standing as an Attorney and Counselor-at-Law.*

In Witness Whereof, I have hereunto set my hand in the City of New York on April 1, 2021.



Susanna M. Rojas

Clerk of the Court