

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APR 08 2021

SC Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

Walton J. McLeod, Circuit Judge

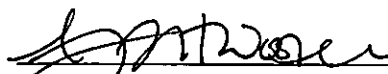
Appellate Case 2021-000033
Case No. 2018-CP-32-04329

John Deere Construction & Forestry Company,
Plaintiff-Respondent,

v.

North Edisto Logging, Inc. and Paul Gunter,
Defendants-Appellants.

RESPONDENT'S NOTICE OF FILING OF ORDER ADMITTING COUNSEL *PRO*
HAC VICE



Amy H. Wooten, Esq.

S.C. State Bar I.D. No.: 100128

N.C. State Bar I.D. No.: 39762

For the firm of Ward and Smith, P.A.

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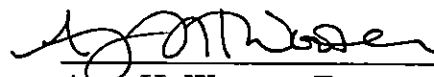
E-mail: ahwooten@wardandsmith.com

Paul A. Fanning
N.C. State Bar I.D. No.: 25477
Admitted *Pro Hac Vice*
email: paf@wardandsmith.com
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Telephone: 919.277.9100
Facsimile: 919.277.9177

Attorneys for Respondent-Plaintiff

PLEASE TAKE NOTICE that Plaintiff-Respondent John Deere Construction & Forestry Company ("Respondent"), by and through the undersigned attorneys, hereby is filing the attached Order Admitting Counsel Pro Hac Vice ("Order"), pursuant to Rule 404(c) of the South Carolina Rules Governing the Practice of Law, and providing notice of the following regular member of the South Carolina Bar associated with this case and the attached Order:

Amy H. Wooten, Esq.
S.C. State Bar I.D. No.: 100128
N.C. State Bar I.D. No.: 39762
E-mail: ahwooten@wardandsmith.com



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Attorneys for Respondent-Plaintiff

Raleigh, North Carolina
April 7, 2021.

STATE OF SOUTH CAROLINA
COUNTY OF LEXINGTON

IN THE COURT OF COMMON PLEAS
ELEVENTH JUDICIAL CIRCUIT
CASE NO. 2018-CP-3204329

JOHN DEERE CONSTRUCTION &)
FORESTRY COMPANY,)
Plaintiff)
)
v.)
)
NORTH EDISTO LOGGING, INC.)
and PAUL D. GUNTER,)
Defendants)

ORDER ADMITTING COUNSEL
PRO HAC VICE

THIS MATTER comes before the Court upon motion of Edward J. Coyne III, with the firm of Ward and Smith, P.A., by and with the consent of counsel for the Defendants, for the admission of Paul A. Fanning to practice *pro hac vice* before this Court in the above captioned action as attorney for Plaintiff John Deere Construction & Forestry Company.

The Court having reviewed the motion and application of Paul A. Fanning, finds that Paul A. Fanning is qualified to practice before this Court.

NOW, THEREFORE, upon the motion of Edward J. Coyne III, and by and with the consent of counsel for the Defendants, Paul A. Fanning is hereby admitted *pro hac vice* to practice before this Court and represent Plaintiff John Deere Construction & Forestry Company.

IT IS SO ORDERED.

Judge Presiding

_____, South Carolina
March ____, 2020



Lexington Common Pleas

Case Caption: John Deere Construction & Forestry Company VS North Edisto Logging Inc , defendant, et al
Case Number: 2018CP3204329
Type: Order/Pro Hac Vice

It Is So Ordered


s/ Walton J. McLeod

CERTIFICATE OF SERVICE

I hereby certify that on April 7, 2021 the foregoing RESPONDENT'S NOTICE OF FILING OF ORDER ADMITTING COUNSEL *PRO HAC VICE* was served on the following person by depositing a copy thereof in an envelope bearing sufficient postage in the United States mail, addressed to the following person at the following address which is the last addresses known to me:

D. Randolph Whitt, Esq.
Fleming & Witt, P.A.
344 Blossom View Court
West Columbia, SC 29170
Counsel for Appellants-Defendants

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Amy H. Wooten, Esq.
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Attorneys for Respondent-Plaintiff

Raleigh, North Carolina
April 7, 2021.

ND: 4841-2710-0900, v. 1

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April 7, 2021

VIA OVERNIGHT DELIVERY

Ms. Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

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RE: John Deere Construction & Forestry Company / North Edisto Logging, Inc. and
Paul D. Gunter
Appellate Case: 2021-000033
Appeal From Lexington County Court File: 2018-CP-32-04329
Our File 070644-00226

Dear Ms. Kitchings:

Enclosed are the original and six copies each of the following documents:

- 1) Respondent's Notice of Filing of Order Admitting Counsel *Pro Hac Vice*;
- 2) Respondent's Motion to Dismiss Appeal;
- 3) Affidavit of Amy H. Wooten in Support of Respondent's Motion to Dismiss Appeal;
and
- 4) Memorandum of Law in Support of Respondent's Motion to Dismiss Appeal.

Please file the original, stamp the copies with the necessary filing information and then return the firm's copy of each document to me in the enclosed self-addressed, postage prepaid envelope that I have provided for your convenience. By copy of this letter, I am sending a copy of these documents to opposing counsel.

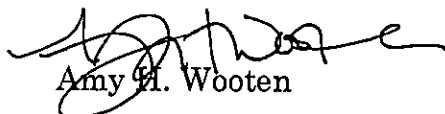
In addition, enclosed is our firm's check in the amount of \$50.00 representing the filing fee as established by the Supreme Court, in connection with the Motion to Dismiss.

WARD AND SMITH, P.A.

Ms. Jenny Abbott Kitchings
April 7, 2021
Page 2

Many thanks for your attention to this matter.

Yours truly,


Amy M. Wooten

ND: 4813-4575-9460, v. 1

Enclosures

cc: D. Randolph Whitt, Esq. (w/encs.)

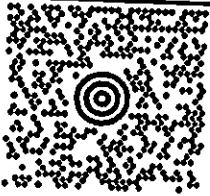
AHWOOTEN
9192779100
WARD AND SMITH - RALEIGH
751 CORPORATE CENTER
RALEIGH NC 27607

9 LBS

1 OF 1

DWT: 12,10,6

SHIP TO:
CLERK OF COURT
MS. JENNY ABBOTT KITCHINGS
1220 SENATE STREET
SOUTH CAROLINA COURT OF APPEALS
COLUMBIA SC 29201-3769



SC 292 9-01



UPS NEXT DAY AIR

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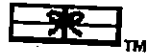
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BILLING: P/P

Client Matter Number: 070644-00226
Initials: 1622/AHW

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APR 08 2021

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