

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
(CHARLESTON DIVISION)

RECEIVED

Oct 13 2021

S.C. SUPREME COURT

WILLIAM O. DICKERSON,)
Petitioner,)
v.)
BRYAN P. STIRLING, Director,)
South Carolina Department of Corrections,)
And KENNETH NELSEN, Warden,)
Broad River Correctional Institution,)
Respondents.)

No. _____
CAPITAL CASE

Motion in Support of Pro Hac Vice Application

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that Gerald King, Jr., be admitted *pro hac vice* in the above-captioned case as associate counsel. As local counsel, I understand that:

- I will personally sign and include my District of South Carolina federal bar attorney identification number on each pleading, motion, discovery procedure, or other document that I serve or file in this court; and
- All pleadings and other documents that I file in this case will contain my name, firm name, address, and phone number and those of my associate counsel admitted *pro hac vice*; and
- Service of all pleadings and notices as required shall be sufficient if served upon me, and it is my responsibility to serve my associate counsel admitted *pro hac vice*; and
- Unless excused by the court, I will be present at all pretrial conferences, hearings, and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.
- Certification of Consultation (Local Civil Rule 7.02).
 - Prior to filing this Motion, I conferred with opposing counsel who has indicated the following position as to this Motion: will likely oppose; does not intend to oppose
 - Prior to filing this Motion, I attempted to confer with opposing counsel but was unable to do so for the following reason(s):

No duty of consultation is required because the opposing party is proceeding pro se.

The Grose Law Firm, LLC
Firm Name
404 Main Street
Street Address or Post Office Box
Greenwood, SC 29646
City, State, Zip Code
864-538-4466
Telephone Number
charles@groselawfirm.com
E-Mail Address

E. Charles Grose, Jr.
Name of Local Counsel
s/E. Charles Grose, Jr.
Signature of Local Counsel
Local Counsel for the Petitioner
District of South Carolina
Federal Bar Number 6072

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No. _____
CAPITAL CASE

Application/Affidavit for Pro Hac Vice Admission

(1) Name: Gerald Wesley King, Jr.
First Middle Last

(2) Residence. I reside in the following state: North Carolina
If a South Carolina resident, indicate months/years of residence: _____

(3) Business Address. I am an attorney and practice law under the name of or as a member of the following firm:

Firm name: Capital Habeas Unit for the Fourth Circuit

Federal Public Defender for the Western District of North Carolina

Mailing address: 129 West Trade Street, Suite 300 City/State/Zip: Charlotte, N.C. 28202

Telephone number: 704-373-0720

Facsimile number: 704-375-2287

E-mail address: gerald_king@fd.org

(Application will not be considered without an e-mail address to receive electronic notification.)

(4) Jurisdiction of this Court. I, by execution of this Application and Affidavit, consent and agree to comply with the applicable statutes, laws, and rules of the State of South Carolina, with all applicable federal statutes, laws, and rules, including Local Rules of the United States District Court for the District of South Carolina (particularly, Local Civil Rule 83.I.08 and/or Local Criminal Rule 57.I.08). I consent to the jurisdiction of the United States District Court for the District of South Carolina in all matters of attorney conduct.¹

(5) Regular Practice of Law. I am a member in good standing of the bar of the highest court of the District of Columbia or the State of Georgia where I regularly practice law. **Attached is my certificate of good standing.**

¹This District 1 maintains a web site (www.scd.uscourts.gov) from which the federal and local rules of procedure and related materials may be obtained.

- (6) Additional Bar Membership. I have been admitted to practice before the following courts: (List all of the 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.) By signing this Affidavit, I certify that I am a member in good standing of each of the listed bars unless otherwise noted.

Court	Date Admitted	Good Standing	
Supreme Court of Georgia		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Northern District of Georgia		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Middle District of Georgia		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
District of Columbia		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Fourth Circuit		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Eleventh Circuit		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
D.C. Circuit		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Supreme Court of the United States		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

- (7) Pending Disciplinary Matters. Are you presently the subject of any formal suspension or disbarment proceedings, and have you been notified by any disciplinary agency of the initiation of formal procedures? Yes No
 (If "yes," give particulars, such as jurisdiction, court, date, grounds. Information to comply with this paragraph may be provided *in camera* but that fact shall be revealed below.)
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- (8) Curtailment of Prior *Pro Hac Vice* Admissions. Have you ever had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked?
 Yes No
 (If "yes," give particulars, such as date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation.)
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- (9) Sanctions. Have you ever had any certificate or privilege to appear and practice before any judicial or administrative body suspended or revoked, or received a public reprimand or greater sanction?
 Yes No
 (If "yes," give particulars, e.g., judicial or administrative body, date of suspension, and reinstatement.)
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- (10) Criminal Sanctions. Have you ever been convicted of a felony under the laws of the District of Columbia or of any State or under the laws of the United States?
 Yes No
 (If "yes," give particulars, such as date, court, judge, circumstances, and ultimate disposition.)
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- (11) Present and Previous *Pro Hac Vice* in this Court. Have you, within the last ten (10) years, filed an application to appear *pro hac vice* in the United States District Court for the District of South Carolina or another court in the state of South Carolina?

Yes No

(If "yes," give court, case name, docket number, and status of litigation, year of application, local counsel of record in each case, and state whether application is pending or was granted.) Attach additional pages if necessary. **See Appendix A, Attached.**

I have been admitted pro hac vice in the United States District Court for South Carolina in four interrelated matters stemming from my appointment pursuant to §3599 to represent two prisoners under state sentences of death: Brad Sigmon and Freddie Owens. I have attached a chart providing the requested information as to those cases.

- (12) Designated Local Counsel. Local counsel of record associated with Applicant in this case is:

Attorney Name:	E. Charles Grose, Jr.
Firm Name:	The Grose Law Firm, LLC
Street Address or Post Office Box:	400 Main Street
City, State, and Zip Code:	Greenwood, SC 29646
Telephone Number:	864-538-4466
E-Mail Address:	charles@groselawfirm.com

I understand that local counsel of record is required to: (1) personally sign each pleading, motion, discovery procedure, or other document served or filed in this Court; (2) accept service of all pleadings and notices as required on behalf of all counsel for the party represented; (3) be present at all pretrial conferences, hearings and trials, unless excused by the Court; (4) be prepared to participate actively as may be necessary; and (5) assure compliance with Local Civil Rules 83.I.04, 83.I.05, and 83.I.06 or Local Criminal Rules 57.I.04, 57.I.05, and 57.I.06 as appropriate. Local counsel of record may attend discovery proceedings.

- (13) Associated Counsel. In addition to local counsel designated above, the following counsel are also associated with the undersigned in this case.

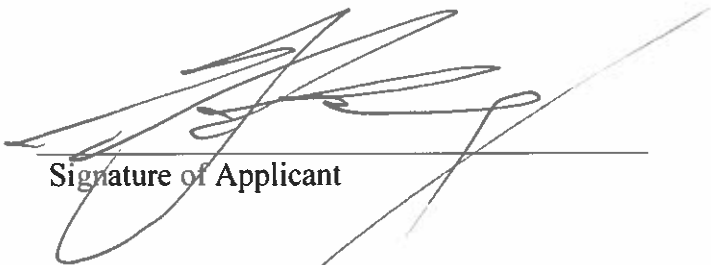
Gretchen L. Swift
Assistant Federal Public Defender, Fourth Circuit Capital Habeas Unit
Federal Public Defender for the Western District of NC
129 West Trade Street, Suite 300
Charlotte, NC 28202
(704)374-0720
Gerald_King@fd.org

- (14) Application Fee. As I am a Federal Public Defender appearing within the scope of my duties with the Capital Habeas Unit for the Fourth Circuit, I have sought waiver of the application fee of two hundred and fifty dollars (\$250) required by Local Civil Rule 83.I.05 or Local Criminal Rule 57.I.05.

- (15) Electronic Notification. By submitting this application, I consent to electronic notification.

- (16) Represented Party/Parties. I seek to represent the following party/parties:
William Dickerson

- (17) I certify that I have read Local Civil Rule 30.04 regarding the conduct of depositions.



Signature of Applicant

Sworn to and subscribed before me
this 10th day of September, 2021.

Sarah Hewitt
A Notary Public
of the State of North Carolina

My Commission expires: 08/29/2022





Supreme Court
State of Georgia
STATE JUDICIAL BUILDING
Atlanta 30334

September 8, 2021

I hereby certify that Gerald W. King Jr., Esq., was admitted on the 17th day of April, 2015, as a member of the bar of the Supreme Court of Georgia, the highest court of the State; and, since that date he has been and is now a member of this bar in good standing, as appears from the records and files in this office.

Witness my signature and the seal of this Court,
hereto affixed the day and year first above written.



Theresa S. Bann, Clerk