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**Oct 27 2021**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas  
Jean Hofer Toal, Chief Justice (Ret.)

Case No. 2020-CP-40-01226

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Appellate Case No. 2020-001239

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Covil Corporation, by and through its duly appointed Receiver, Peter D. Protopapas,

Respondent,

v.

Pennsylvania National Mutual Casualty Insurance Company,

Appellant.

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**MOTION FOR ADMISSION  
*PRO HAC VICE***

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Peter D. Protopapas, in his capacity as the Receiver for Covil Corporation (“Covil” or “the Receiver”), by and through the undersigned counsel, respectfully moves this Court to permit William Bradley Nes to practice *Pro Hac Vice* before the South Carolina Court of Appeals in the above-captioned appeal. The Receiver is filing this Motion in anticipation of oral argument scheduled for November 2, 2021.

Pursuant to Rule 404 of the South Carolina Appellate Court Rules, Mr. Nes and counsel of record, Shanon N. Peake, have filed a copy of the Verified Application for Admission *Pro Hac*

*Vice* with the South Carolina Supreme Court, along with the requisite fee. The Verified Application and Certificate of Good Standing are attached hereto.

WHEREFORE, as the provisions of Rule 404, SCACR, have been met, Covil respectfully requests that this Motion be granted.

Respectfully submitted,

*s/ Shanon N. Peake*

G. Murrell Smith, Jr. (S.C. Bar # 66263)

Jonathan M. Robinson (S.C. Bar # 68285)

**Shanon N. Peake (S.C. Bar #102723)**

Smith Robinson Holler DuBose and Morgan, LLC

2530 Devine Street, Third Floor

Columbia, South Carolina 29205

(803) 254-5445

ATTORNEYS FOR RESPONDENT

October 27, 2021

Columbia, South Carolina

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

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**Oct 27 2021**

**SC Court of Appeals**

Covil Corporation, by and through its duly appointed Receiver	Appellate Case No. 2020- 001239	State of South Carolina, Court of Appeals
Plaintiff	Case No.	Tribunal
vs.		
Pennsylvania National Mutual Casualty Insurance Company	Mailing Address of Tribunal:	Clerk of the Court
Defendant		PO Box 11629 Columbia, SC 29211

Comes now William Bradley Nes, applicant herein, and respectfully represents the following:

1. Applicant resides at:  
221 Baden Street  
 Street Address  
Silver Spring                      Montgomery                      MD                      20901  
 City                                      County                                      State                                      Zip Code  
202-299-7033  
 Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of)  
Morgan Lewis & Bockius, LLP, with offices at  
1111 Pennsylvania Avenue, NW  
 Street Address  
Washington                                      District of Columbia                                      20004  
 City                                      County                                      State                                      Zip Code  
202-739-5799                                      202-299-7033                                      202-739-3001                                      brad.nes@morganlewis.com  
 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  
Covil Corporation, by and through its duly appointed Receiver 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 6 of 2007, 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 \_\_\_\_\_ 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:
Texas	11/04/2005

Court:	Date Admitted:
DC	07/06/2007
U.S.D.C. for DC	10/05/2009
U.S. Court of Appeals for the D.C. Circuit	03/20/2012
U.S. Court of Appeals for the Third Circuit	01/28/2014
U.S. Court of Appeals for the Fourth Circuit	03/17/2017
U.S. Court of Appeals for the Tenth Circuit	06/17/2011

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.)

N/A

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):

N/A

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):

N/A

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):

N/A

9. Local counsel of record associated with applicant in this case is Shanon N. Peake of the Smith Robinson Holler DuBose and Morgan, LLC law firm, which has offices at:

2530 Devine Street, Third Floor  
Street Address  
Columbia                      Richland                      SC                      29205  
City                                      County                                      State                                      Zip Code  
803-254-5445                      803-254-5007                      shanonp@smithrobinsonlaw.com  
Primary Telephone                      Cell Phone                      Fax Number                      Email Address  
102723  
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).

See Attachment A

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 20 day of October, 2021



\_\_\_\_\_  
APPLICANT

**VERIFICATION**

STATE OF Maryland )

COUNTY OF Montgomery )

I, William Bradley Nes, 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.

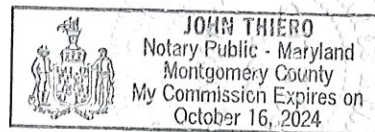
William B. Nes  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 20<sup>th</sup> day of October, 20 21

[Signature]

Notary Public for the State of Maryland

My Commission Expires: 10/16/2024



**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 25 day of October, 20 21

Alan Perke  
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

25 day of October, 20 21

Alan Perke  
APPLICANT/AFFIANT

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APPEAL FROM RICHLAND COUNTY  
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Respondent,

v.

Pennsylvania National Mutual Casualty Insurance Company,

Appellant.

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**PROOF OF SERVICE**

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I certify that a true copy of the Motion for Admission *Pro Hac Vice* in this case has been served on the following, this 27th day of October, 2021, by emailing a copy to each attorney listed below using their primary email address listed in the Attorney Information System pursuant to Rule 262 of the South Carolina Appellate Court Rules and the August 25, 2021 Order of the South Carolina Supreme Court (Appellate Case No. 2020-000447).

David G. Harris II – [dharris@goldbergsegalla.com](mailto:dharris@goldbergsegalla.com)

*(Signature page follows)*

*s/ Shanon N. Peake* \_\_\_\_\_

G. Murrell Smith, Jr. (S.C. Bar # 66263)

Jonathan M. Robinson (S.C. Bar # 68285)

**Shanon N. Peake (S.C. Bar #102723)**

Smith Robinson Holler DuBose and Morgan, LLC

2530 Devine Street, Third Floor

Columbia, South Carolina 29205

(803) 254-5445

*Attorneys for Respondent Covil Corporation, by  
and through its duly appointed Receiver, Peter D.  
Protopapas*

October 27, 2021

**From:** [Shanon Peake](#)  
**To:** [dharris@goldbergsegalla.com](mailto:dharris@goldbergsegalla.com); [byntema@goldbergsegalla.com](mailto:byntema@goldbergsegalla.com); ["dbrown@goldbergsegalla.com"](mailto:dbrown@goldbergsegalla.com)  
**Cc:** [Dot Faulkenberry](#)  
**Subject:** Appellate Case No. 2020-001239  
**Date:** Wednesday, October 27, 2021 10:43:00 AM  
**Attachments:** [PHV Application B. Nes, 1.pdf](#)  
[Motion For Admission PHV - Nes, 2.pdf](#)  
[POS - Pro Hac Vice Motion, 4.pdf](#)

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Good Morning,

Please find attached for service a copy of the Motion for Pro Hac Vice Admission of Brad Nes that we are filing with the Court of Appeals today in the above-referenced appeal.

Thank you,  
Shanon

**SMITH ROBINSON**

Forward thinking. Results driven.

*Smith Robinson Holler DuBose and Morgan, LLC*

[www.SmithRobinsonLaw.com](http://www.SmithRobinsonLaw.com)

**Shanon Peake**

*Attorney at Law*

E: [shanonp@smithrobinsonlaw.com](mailto:shanonp@smithrobinsonlaw.com) **Columbia Office**  
P: 803.254.5445 2530 Devine Street  
D: 803.704.1102 Columbia, SC 29205  
F: 803.254.5007

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