

Oct 28 2021

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

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
Defendant

Mailing Address of Tribunal:

Clerk of Court

PO Box 11629

Columbia, SC 29211

Comes now Brady Allen Yntema, applicant herein, and respectfully represents the following:

1. Applicant resides at:
4306 Agilano Terrace

Street Address

Greensboro

Guilford

NC

27358

City

County

State

Zip Code

336-908-1946

Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Goldberg Segalla LLP, with offices at 701 Green Valley Road, Suite 310

Street Address

Greensboro

Guilford

NC

27408

City

County

State

Zip Code

336-419-4900

336-908-1946

336-419-4950

byntema@goldbergsegalla.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 Pennsylvania National Mutual Casualty Insurance Company 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 29th of August, 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 North Carolina 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:
See attached.	

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.)

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 David G. Harris II of the Goldberg Segalla LLP law firm, which has offices at:

701 Green Valley Road, Suite 310

Street Address

<u>Greensboro</u>	<u>Guilford</u>	<u>NC</u>	<u>27408</u>
City	County	State	Zip Code
<u>336-419-4900</u>	<u>336-301-0101</u>	<u>336-419-4950</u>	<u>dharris@goldbergsegalla.com</u>
Primary Telephone	Cell Phone	Fax Number	Email Address
<u>101951</u>			
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 attached.

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 28th day of October, 2021


APPLICANT

:

VERIFICATION

STATE OF SOUTH CAROLINA)

COUNTY OF RICHLAND)

I, Brady Allen Yntema, 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]

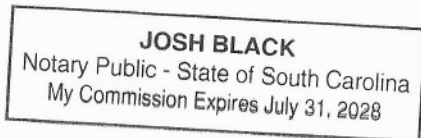
APPLICANT/AFFIANT

Subscribed and sworn to before me this 28th day of OCTOBER, 20 21

[Signature]

Notary Public for the State of SOUTH CAROLINA

My Commission Expires: July 31, 2028



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 28th day of October, 20 21

[Signature]
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 28th day of October, 20 21

[Signature]

APPLICANT/AFFIANT



6. List all Courts you are admitted to practice:

Number	Court	Date	Status
1	North Carolina State Courts	1998	Good Standing
2	U.S. Middle District of North Carolina	1998	Good Standing
3	U.S. Eastern District of North Carolina	2005	Good Standing
4	U.S. Western District of North Carolina	2005	Good Standing
5	4 th Circuit of Appeals (Richmond, VA)	2005	Good Standing

11. Present and previous pro hac vice Motion Granted in South Carolina:

1. Steven Redfern Stewart v. Albany International Corp., et al.
Case No: 2013-CP-46-000368 (2013)
County: York County
Motion Granted – Case now closed.
Local Counsel:
2. Timothy W. Howe, as Personal Representative of the Estate of Wayne E. Howe, deceased, and Jeanette Howe, surviving spouse v. Air & Liquid Systems Corporation, et al.
Case No: 2015-CP-46-003456 (2015)
County: York County
Motion Granted (2018) – Case on appeal; however, our client has been dismissed.
Local Counsel: David G. Harris II
3. Rita Joyce Glenn, Individually and as Personal Representative of the Estate of Thomas Harold Glenn v. 3M Company f/k/a Minnesota Mining and Manufacturing Co., et al.
Case No: 2015-CP-04-01607 (2015)
County: Anderson County
Motion Granted (2018) – Case on appeal; however, our client has been dismissed.
Local Counsel: David G. Harris II
4. Covil Corporation, by and through its duly appointed Receiver, Peter D. Protopapas v. Pennsylvania National Mutual Casualty Insurance Company
Case No: 2020-CP-40-01226 (2020)
County: Richland County
Motion Granted (2020) – Case ongoing
Local Counsel: David G. Harris II

5. Ann Finch, Individually, and as Executor of the Estate of Franklin Finch, and Peter D. Protopapas, as Court Appointed Receiver for Covil Corporation v. United States Fidelity & Guaranty Company
Case No: 2019-CP-40-03003 (2019)
County: Richland County
Motion Granted (2021) – Case ongoing
Local Counsel: David G. Harris II

6. Covil Corporation, by and through its duly Appointed Receiver, Peter D. Protopapas v. Pennsylvania National Mutual Casualty Insurance Co; Sam J. Crain & Co., Inc.; and South Carolina Property and Casualty Insurance Guaranty Association
Case No: 2020-CP-40-02098 (2020)
County: Richland County
Motion Granted (2021) – Case ongoing
Local Counsel: Alexander E. Davis

Supreme Court OF THE STATE OF NORTH CAROLINA




I, Amy L. Funderburk, Clerk of the Supreme Court of North Carolina, do hereby certify that on August 29, 1998, license to practice as an Attorney and Counselor at Law in all the Courts of this State was issued by the North Carolina Board of Law Examiners to

Brady A. Yntema

according to the certified list of licentiates reported by the Secretary of said Board and filed in my office as required by statute.

To the date of this certificate, no order revoking said license has been filed with this Court and no order suspending same is in effect.

WITNESS my hand and the Seal of the Supreme Court of North Carolina at office in Raleigh, this September 15, 2021.



Amy L. Funderburk

Amy L. Funderburk
Clerk of the Supreme Court
of the State of North Carolina

October 28, 2021

Via Hand DeliverySupreme Court of South Carolina
Office of Bar Admissions
1220 Senate Street
Columbia, SC 29201**RECEIVED****Oct 28 2021****SC Court of Appeals****Re: Verified Application for Admission *pro hac vice* for Brady A. Yntema**

Dear Sir or Madam:

Please find enclosed the Verified Application for Admission *pro hac vice* in the State of South Carolina for Brady A. Yntema. I am also enclosing our firm check in the amount of \$250.00. We have filed Motion to Admit Brady A. Yntema *pro hac vice* with the South Carolina Court of Appeals in Columbia, SC, Appellate Case No: 2020-001239.

Thank you for your assistance in this matter. If you have any questions or concerns, please do not hesitate to contact me.

With kindest regards, I am

Sincerely,

GOLDBERG SEGALLA LLP



Dale R. Smith, NCCP

Paralegal to Brady A. Yntema

/drs

Enclosures

GOLDBERG SEGALLA LLP
800 GREEN VALLEY RD
GREENSBORO, NC 27408

1665

50-7044/2223
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DATE 10-27-21

PAY TO THE ORDER OF Supreme Court of South Carolina

\$ 250.00

two hundred fifty & 00/100

DOLLARS

 Photo Safe Deposit®
Details on back



KeyBank National Association
1-800-KEY2YOU® Key.com®

FOR Coril-pro hac vice for B. Yntema

David C. Dyer

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