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Feb 09 2022

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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CERTIFIED QUESTIONS FROM THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

Mary Geiger Lewis, United States District Court Judge

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Appellate Case No. 2021-001209  
District Court Case No. 3:20-cv-02275

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Sullivan Management, LLC,

Plaintiff,

v.

Fireman's Fund Insurance Company, and Allianz Global Risks US Insurance Company,

Respondents.

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

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Pursuant to Rule 404 of the South Carolina Appellate Court Rules, Shanon N. Peake, a member in good standing of the South Carolina Bar, hereby moves this Court for an Order admitting Amy Saharia, Esquire to appear *pro hac vice* to practice before this Court for the sole purpose of appearing on behalf of Selective Insurance Company of America in association with the undersigned counsel in the above-captioned case.

In support of this motion, the Verified Application for Admission *Pro Hac Vice* of Amy Saharia, Esquire, attached hereto as Exhibit A and incorporated herein, sets forth her qualifications for admission *pro hac vice* and her agreement to abide by the ethical standards governing the

practice of law in this Court. Pursuant to Rule 404, Ms. Saharia and the undersigned have filed a the Verified Application for Admission *Pro Hac Vice* with the South Carolina Supreme Court, along with the requisite fee.

WHEREFORE, as the provisions of Rule 404, SCACR, have been met, Selective 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 SELECTIVE INSURANCE  
COMPANY OF AMERICA

February 9, 2022

Columbia, South Carolina

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

Feb 09 2022

S.C. SUPREME COURT

<u>Sullivan Management, LLC</u> Plaintiff	<u>2021-001209</u> Case No.	<u>Supreme Court of South Carolina</u> Tribunal
vs.	Mailing Address of Tribunal:	<u>Supreme Court</u> <u>1231 Gervais Street</u> <u>Columbia, SC 29201</u>
<u>Fireman's Fund Insurance Co., et al.</u> Defendant		

Comes now Amy Mason Saharia, applicant herein, and respectfully represents the following:

1. Applicant resides at:  
3220 Farmington Drive  
 Street Address  
Chevy Chase MD 20815  
 City County State Zip Code  
203-499-8022  
 Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of)  
Williams & Connolly LLP, with offices at  
725 12th Street NW  
 Street Address  
Washington DC DC 20005  
 City County State Zip Code  
202-434-5000 203-499-8022 202-434-5029 asaharia@wc.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 Selective Insurance Company of America 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 June 16 of 2008, 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 District of Columbia 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 "ATTACHMENT A"	



VERIFICATION

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S.C. SUPREME COURT

STATE OF District of Columbia )

COUNTY OF \_\_\_\_\_ )

I, Amy Mason Saharia, 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.

Amy M. Saharia  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 2nd day of February, 20 22

Denise P. Zdelean

Notary Public for the State of District of Columbia

My Commission Expires: April 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 February, 20 22

[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

8 day of February, 20 22

Amy M. Saharia  
APPLICANT/AFFIANT

**Amy Mason Saharia-Bar Membership**

<i>State, Federal Bar or Court</i>	<i>Bar Number</i>	<i>Date Admitted</i>	<i>Status</i>
District of Columbia	981644	06/16/2008	Active
New York	(Registration No.) 4434957	09/21/2006	Active
Connecticut	425072	10/31/2005	Active
U.S. Supreme Court	279830	05/21/2011	Active
U.S. Court of Appeals for the District of Columbia Circuit	56742	05/31/2016	Active
U.S. Court of Appeals for the Federal Circuit	--	04/09/2015	Active
U.S. Court of Appeals for the First Circuit	1187833	03/05/2019	Active
U.S. Court of Appeals for the Second Circuit	--	04/14/2017	Active
U.S. Court of Appeals for the Third Circuit	--	07/13/2015	Active
U.S. Court of Appeals for the Fourth Circuit	--	10/24/2017	Active
U.S. Court of Appeals for the Fifth Circuit	--	03/08/2019	Active
U.S. Court of Appeals for the Seventh Circuit	--	10/23/2015	Active

U.S. Court of Appeals for the Eighth Circuit	--	11/24/2015	Active
U.S. Court of Appeals for the Ninth Circuit	--	02/21/2012	Active
U.S. Court of Appeals for the Tenth Circuit	--	05/14/2019	Active
U.S. Court of Appeals for the Eleventh Circuit	--	08/14/2015	Active
U.S. District Court for the District of Columbia	981644	10/5/2015	Active
U.S. District Court for the Northern District of New York		05/23/2019	Active



On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals,  
the District of Columbia Bar does hereby certify that

*Amy Mason Saharia*

was duly qualified and admitted on June 16, 2008 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 February  
1, 2022.**

*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](mailto:memberservices@dcbbar.org).