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S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In The Supreme Court

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

Mary Geiger Lewis, United States District Court Judge

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

Sullivan Management, LLC,

Plaintiff,

v.

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

Respondents.

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

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 Kaitlin Beach, 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 Kaitlin Beach, 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. Beach 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

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 Shanon N. Peake of the Smith Robinson Holler DuBose & Morgan LLC law firm, which has offices at:

2530 Devine Street
Street Address
Columbia Richland SC 29205
City County State Zip Code
803-254-5445 _____
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).

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 2 day of February, 20 22



APPLICANT

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VERIFICATION

STATE OF District of Columbia)

COUNTY OF _____)

I, Kaitlin J. Beach, 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 2nd day of February, 20 22

Denise D. Zeller

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

[Signature]

APPLICANT/AFFIANT



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

Kaitlin J Beach

was duly qualified and admitted on March 12, 2020 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

[Signature]

Issued By:
District of Columbia Bar Membership

For questions or concerns, please contact the D.C. Bar Membership Office at 202-626-3475 or email
memberservices@dcbar.org.