

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

Christine Watts,

2012-CP-23-07156

S.C. Ct. Appeals

Plaintiff

Case No.

Court

vs.

Mailing Address of Court: S.C. Ct. of Appeals

Sonic Automotive 2752 Laurens Road,
Greenville, Inc. d/b/a Century BMW

PO Box 11629
Columbia, SC 29211

Defendant

MAY 08 2013

Comes now Dennis M. Black, applicant herein, and respectfully represents the following:

SC Court of Appeals

1. Applicant resides at:

1733 Q Street, NW

Street Address

Washington

City

County

DC

State

20009

Zip Code

202-462-0860

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, at

725 Twelfth St., N.W.

Street Address

District of Columbia

City

County

DC

State

20005

Zip Code

(202) 434-5000

Telephone

(202) 434-5029

Fax Number

3. Applicant has been retained personally or as a member of the above named law firm by Sonic Automotive to provide legal representation in connection with the above case now pending before the above named court of the State of South Carolina.

4. Since December 17 of 1992, 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.

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	

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 administrative body suspended or revoked, except as provided below (give particulars, e.g., date, administrative body, date of suspension and reinstatement):

N/A

9. Local counsel of record associated with applicant in this case is Kurt M. Rozelsky, of the Smith Moore Leatherwood law firm, which has offices at:

300 E. McBee Ave.

Street Address

Greenville

Greenville

South Carolina

29601

County

City

State

Zip Code

864 242-6440

Telephone

If applicable list all other firms/attorneys you are associated with in this matter

Williams & Connolly LLP (Richmond T. Moore)

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).

Heather Herron, et al v. Century BMW a/k/a Sonic Automotive, et al.

Case No. 06-CP-02-1230 (Court of Appeals)

S.C. Admission Granted: June 6, 2008

Local Counsel: Steven W. Hamm

David A. Anderson

C. Jo Anne Wessinger Hill

RICHARDSON, PLOWDEN & ROBINSON, P.A.

1900 Barnwell Street

Post Office Drawer 7788

Columbia, South Carolina 29202
(803) 771-4400
(803) 779-0016 facsimile

Heather Herron, et al v. Car Max Superstores, Inc., et al
Case No. 06-CP-02-1230 – ACTIVE
Date of Application: January 30, 2007, S.C., Admission Granted

Local Counsel: Steven W. Hamm
David A. Anderson
C. Jo Anne Wessinger Hill
RICHARDSON, PLOWDEN, CARPENTER
& ROBINSON, P.A.
1900 Barnwell Street
Post Office Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400
(803) 779-0016 facsimile

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 court for this case only.

DATED this 3rd day of May, 2013.

D. Black
APPLICANT

VERIFICATION

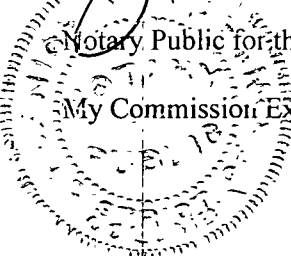
STATE OF District of Columbia
COUNTY OF _____

I, Dennis M. Black, 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.

D. Black
APPLICANT/AFFIANT

Subscribed and sworn to before me this 3rd day of May, 2013.

Janice V. Martin



Notary Public for the State of District of Columbia
Janice V. Martin
NOTARY PUBLIC, DISTRICT OF COLUMBIA
My Commission Expires **May 31, 2014**

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 7th day of May, 2013.

J. Martin
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 7th day of May, 2013.

J. Martin
APPLICANT/AFFIANT

**ATTACHMENT A TO
VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE*
IN THE STATE OF SOUTH CAROLINA
FOR DENNIS M. BLACK**

Christine Watts

v.

Sonic Automotive 2752 Laurens Road, Greenville, Inc. d/b/a Century BMW

Case No. 2012-CP-23-07156

<u>Court</u>	<u>Date Admitted</u>
District of Columbia	1992
U.S. Court of Appeals for the District of Columbia	12/7/1992
U.S. Court of Appeals for the Fifth Circuit	9/24/1998
U.S. Court of Appeals for the Sixth Circuit	10/21/1999
U.S. Court of Appeals for the Eleventh Circuit	7/13/1995
U.S. District Court for the District of Columbia	10/4/1993
U.S. District Court for the Eastern District of Michigan	7/27/1998
U.S. District Court for the District of Colorado	4/17/2006
U.S. Court of Appeals for the District of Columbia Circuit	1993
Court of Appeals of Maryland	1990
U.S. Court of Appeals for Second Circuit	11/2010

**IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals**

**APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas**

The Honorable Doyet A. Early, Circuit Court Judge

Case No. 2012-CP-23-07156

CHRISTINE WATTS

Respondent,

v.

**SONIC AUTOMOTIVE 2752 LAURENS ROAD, GREENVILLE, INC. d/b/a CENTURY
BMW**

Appellant.

AFFIDAVIT OF DENNIS M. BLACK

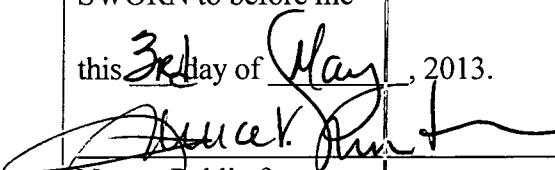
I, Dennis M. Black, do hereby state as follows:

1. I am not a resident of South Carolina.
2. I am not regularly employed in South Carolina, nor do I regularly engage in the practice of law or professional activities in South Carolina.

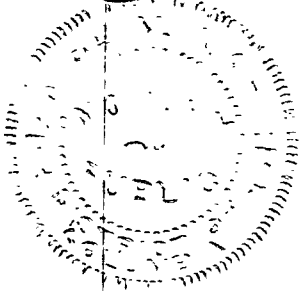


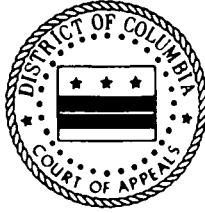
SWORN to before me

this 3rd day of May, 2013.


Notary Public for
My Commission Expires:

Janice V. Martin
NOTARY PUBLIC, DISTRICT OF COLUMBIA
My Commission Expires May 31, 2014





District of Columbia Court of Appeals
Committee on Admissions
430 F Street, N.W. — Room 123
Washington, D. C. 20001
202 / 879-2710

I, JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, do hereby certify that

DENNIS M. BLACK

was on DECEMBER 7, 1992, duly qualified and admitted as an attorney and counselor entitled to practice before this Court and is, on the date indicated below, an 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 April 24, 2013.

JULIO A. CASTILLO
Clerk of the Court

By:

Brenda A. Harbeck

Deputy Clerk

**IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals**

**APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas**

The Honorable Doyet A. Early, Circuit Court Judge

Case No. 2012-CP-23-07156

CHRISTINE WATTS

Respondent,

v.

**SONIC AUTOMOTIVE 2752 LAURENS ROAD, GREENVILLE, INC.
d/b/a CENTURY BMW**

Appellant.

CERTIFICATE OF SERVICE

The undersigned certifies that on the 7th day of May, 2013, she caused to be served the **Motion for Pro Hac Vice of Dennis M. Black** upon counsel of record, by the placing the same in the United States Postal Service with proper, first-class postage affixed and addressed as follows:

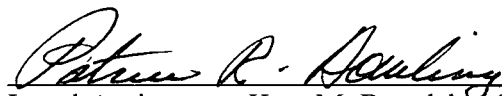
Terry E. Richardson, Esq.
David Butler, Esq.
Brady R. Thomas, Esq.
RICHARDSON, PATRICK, WESTBROOK &
BRICKMAN, LLC
1750 Jackson Street
Barnwell, SC 29812

Michael E. Spears, Esq.
MICHAEL E. SPEARS, PA
Post Office 5806
Spartanburg, SC 29304

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LEWIS, BABCOCK & GRIFFIN, L.L.P
1513 Hampton Street
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Columbia, SC 29211

Gedney M. Howe, III, Esq.
GEDNEY M. HOWE, III, PA
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Charleston, SC 29402

Richard A. Harpootlian, Esq.
RICHARD A. HARPOOTLIAN, PA
P.O. Box 1090
Columbia, SC 29202



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Smith Moore Leatherwood LLP
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Greenville, SC 29602-0087
(864) 242-6440/(864) 240-2498 (Fax)
Kurt.rozelsky@smithmoorelaw.com
Attorney for Appellant