

STATE OF SOUTH CAROLINA)

IN THE COURT OF COMMON PLEAS

COUNTY OF CHARLESTON)

MEGAN A. JOHNSON,)

CASE NO.

Plaintiff)

2019-CP-10-0496

v.)

MOTION AND ORDER INFORMATION
FORM AND COVER SHEET

Daniel C. Moss,)

Defendant.)

Plaintiff's Attorney: Dale Akins, Bar No. 65092 Address: Post Office Box 1547 Bluffton, SC 29910 phone: (843)757-7574 fax: (843)757-7601 e-mail: dakins@hargray.com other:	Defendant's Attorney: Jeffrey M. Crudup, Bar No. Address: Post Office Box 2219 Mt. Pleasant, SC 29465 phone: fax: e-mail: other:
<input type="checkbox"/> MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III) <input type="checkbox"/> FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III) <input checked="" type="checkbox"/> PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)	
SECTION I: Hearing Information	
Nature of Motion: Estimated Time Needed: Court Reporter Needed: <input type="checkbox"/> YES / <input type="checkbox"/> NO	
SECTION II: Motion/Order Type	
<input checked="" type="checkbox"/> Written motion attached <input checked="" type="checkbox"/> Form Motion/Order I hereby move for relief or action by the court as set forth in the attached proposed order.	
_____ Signature of Attorney for <input checked="" type="checkbox"/> Plaintiff / <input type="checkbox"/> Defendant	8/2/19 Date submitted
SECTION III: Motion Fee	
<input checked="" type="checkbox"/> PAID – AMOUNT: \$25.00 <input type="checkbox"/> EXEMPT: <input type="checkbox"/> Rule to Show Cause in Child or Spousal Support (check reason) <input type="checkbox"/> Domestic Abuse or Abuse and Neglect <input type="checkbox"/> Indigent Status <input type="checkbox"/> State Agency v. Indigent Party <input type="checkbox"/> Sexually Violent Predator Act <input type="checkbox"/> Post-Conviction Relief <input type="checkbox"/> Motion for Stay in Bankruptcy <input type="checkbox"/> Motion for Publication <input type="checkbox"/> Motion for Execution (Rule 69, SCRPC) <input type="checkbox"/> Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions Name of Court Reporter: <input type="checkbox"/> Other:	
JUDGE'S SECTION	
<input type="checkbox"/> Motion Fee to be paid upon filing of the attached order. <input type="checkbox"/> Other:	_____ JUDGE CODE: _____ Date: _____
CLERK'S VERIFICATION	
Date Filed: _____ Collected by: _____	
<input type="checkbox"/> MOTION FEE COLLECTED: _____ <input type="checkbox"/> CONTESTED – AMOUNT DUE: _____	

STATE OF SOUTH CAROLINA)
)
COUNTY OF CHARLESTON)

IN THE COURT OF COMMON PLEAS
NINTH JUDICIAL CIRCUIT

Civil Action No. 2019-CP-10-0496

MEGAN A. JOHNSON,)
)
Plaintiff,)
)
vs.)
)
DANIEL C. MOSS,)
)
Defendant.)
_____)

ORDER GRANTING ADMISSION
PRO HAC VICE

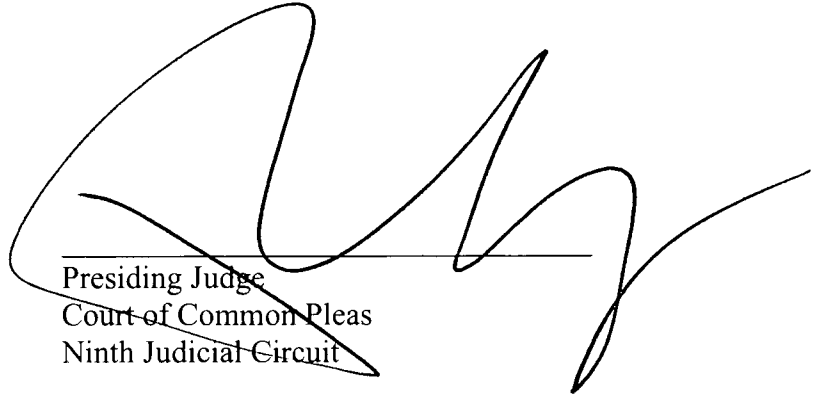
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2019 AUG -8 PM 4:05
JULIE J. ARMSTRONG
CLERK OF COURT

A Verified Application for Admission *Pro Hac Vice* has been received by the Court in the above-referenced case and considered by the undersigned.

IT IS HEREBY ORDERED THAT:

William Drought, III, Esquire, who represents the Plaintiff, be **GRANTED** admission *pro hac vice* in this case.

AND IT IS SO ORDERED.



Presiding Judge
Court of Common Pleas
Ninth Judicial Circuit

Charleston, South Carolina
July 8th, 2019

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

Megan A. Johnson	2019-CP-10-0496	Court of Common Pleas, Ninth Judicial Circuit
Plaintiff	Case No.	Tribunal
vs.		
Daniel C. Moss	Mailing Address of Tribunal:	100 Broad Street
Defendant		Charleston, SC 29401

Comes now I. William Drought, III, applicant herein, and respectfully represents the following:

1. Applicant resides at:

103 Remington Drive	Chatham County	Georgia	31406
Street Address	County	State	Zip Code
Savannah	Chatham County	Georgia	31406
City	County	State	Zip Code
(912) 856-8113			
Telephone			

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 2019 AUG - 8 PM 4: 06
 JUDGE J. ARMSTRONG
 CLERK OF COURT

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Oliver Maner LLP, with offices at

218 West State Street	Chatham County	Georgia	31401
Street Address	County	State	Zip Code
Savannah	Chatham County	Georgia	31401
City	County	State	Zip Code
912-236-3311	912-856-8113	912-236-8725	wdrought@olivermaner.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 Megan A. Johnson 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 October of 2015, 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 Georgia 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:
Superior Court of Georgia	10/30/2015
Court of Appeals of Georgia	12/03/2015

Court:	Date Admitted:
United States District Court for the Southern District of Georgia	04/14/2016
United States District Court for the Middle District of Georgia	03/01/2019
United States District Court for the Northern District of Georgia	08/28/2017

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.)

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):

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):

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):

9. Local counsel of record associated with applicant in this case is Dale Akins
of the Akins Law Firm, LLC law firm, which has offices at:

P.O. Box 1547

Street Address

Bluffton

Beaufort County

South Carolina

29910

City

County

State

Zip Code

843-757-7574

843-757-7601

dakins@hargray.com

Primary Telephone

Cell Phone

Fax Number

Email Address

65092

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).

N/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 16th day of July, 2019



APPLICANT

VERIFICATION

2019-CP-10-496

STATE OF Georgia)

COUNTY OF Chatham)

I, I. William Drought, III, 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.

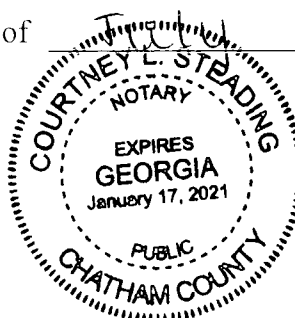
[Signature]
APPLICANT/AFFIANT

Subscribed and sworn to before me this 16 day of

Courtney F. Steading

Notary Public for the State of Georgia

My Commission Expires: 11/17/2021



FILED
2019 AUG -8 PM 4:06
JULIE J. ARMSTRONGS
CLERK OF COURT

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 19th day of July, 2019

[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

19th day of July, 2019

[Signature]
APPLICANT/AFFIANT



State Bar of Georgia

Lawyers Serving the Public and the Justice System

Mr. Irving William Drought, III
Oliver Maner LLP
218 West State Street
PO Box 10186
Savannah, GA 31412

CURRENT STATUS: Active Member-Good Standing
DATE OF ADMISSION: 10/30/2015
BAR NUMBER: 411837
TODAY'S DATE: 06/07/2019

The prerequisites for practicing law in the State of Georgia are as follows:

- Certified by the Office of Bar Admissions, either by Exam, or on Motion (Reciprocity).
- Sworn in to the Superior Court in Georgia, highest court required to practice law in Georgia.
- Enrolled with the State Bar of Georgia, administrative arm of the Supreme Court of Georgia.

This member is currently in “good standing” as termed and defined by **State Bar Rule 1-204**. The member is current in license fees and is not suspended or disbarred as of the date of this letter.



STATE BAR OF GEORGIA

Brinda Lovvorn

Official Representative of the State Bar of Georgia

HEADQUARTERS

104 Marietta St. NW, Suite 100
Atlanta, GA 30303-2743
404-527-8700 • 800-334-6865
Fax 404-527-8717
www.gabar.org

COASTAL GEORGIA OFFICE

18 E. Bay St.
Savannah, GA 31401-1225
912-239-9910 • 877-239-9910
Fax 912-239-9970

SOUTH GEORGIA OFFICE

244 E. 2nd St. (31794)
P.O. Box 1390
Tifton, GA 31793-1390
229-387-0446 • 800-330-0446
Fax 229-382-7435

STATE OF SOUTH CAROLINA)
)
COUNTY OF CHARLESTON)

IN THE COURT OF COMMON PLEAS
NINTH JUDICIAL CIRCUIT

Civil Action No. 2019-CP-10-0496


MEGAN A. JOHNSON,)
)
Plaintiff,)
)
vs.)
)
DANIEL C. MOSS,)
)
Defendant.)
_____)

CERTIFICATE OF SERVICE

FILED
2019 AUG -8 PM 4:05
JULIE J. ARISTOTOME
CLERK OF COURT

The undersigned, Karen White, an employee of the Akins Law Firm, LLC, on behalf of Dale Akins, Esquire, attorney for Plaintiff, does hereby certify that she served the Verified Application for Admission *Pro Hac Vice* of William Drought, III, Esquire. along with a proposed Order Granting Admission, in the above-captioned action upon Jeffrey M. Crudup, Esquire, attorney for Defendant, by causing a copy of same to be deposited in the United States mail at Bluffton, South Carolina, first class postage prepaid and return address clearly indicated on said envelope, addressed to him at Clarkson, Walsh & Coulter, P.A., Post Office Box 2219, Mt. Pleasant, South Carolina, 29465, on the 19th day of July, 2019.

AKINS LAW FIRM, LLC



Karen White
Paralegal to Dale Akins
Post Office Box 1547
6 Johnston Way, Unit A
Bluffton, South Carolina 29910
Telephone: (843)757-7574

Bluffton, South Carolina
July 19, 2019

Akins Law Firm, LLC

Post Office Box 1547
Bluffton, South Carolina 29910

Dale H. Akins

Member South Carolina and Georgia Bar
dakins@hargray.com

Telephone 843.757.7574

Facsimile 843.757.7601

www.daleakinslaw.com

akinslaw@hargray.com

July 19, 2019

Charleston County State Court
Attn: Clerk of Court, Court of Common Pleas
100 Broad Street, Suite 106
Charleston, South Carolina 29401

**Re: Megan A. Johnson vs. Daniel C. Moss
Civil Action No. 2019-CP-10-00496**

Dear Sir or Madam:

Enclosed for filing and consideration by the Court, please find the Verified Application for Admission *Pro Hac Vice* of William Drought, III, Esquire in the above-referenced case.


I have also enclosed a proposed Order Granting Admission. If the Order meets with the Court's approval, I would appreciate you returning a copy of the signed and filed Order to me in the SASE, along with a copy of the filed Application.

By copy of this letter, I am serving opposing counsel with a copy of the Application and proposed Order, and I enclose a Certificate of Service for filing with the Court as well.

Thank you for your assistance in this matter.

Sincerely,

AKINS LAW FIRM, LLC


Karen White
Paralegal to Dale Akins

/kw

Enclosures

cc: Jeffrey M. Crudup, Esquire
William J. Hunter, Esquire
Ms. Megan A. Johnson