

STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF CHARLESTON )  
 )  
 MEGAN A. JOHNSON, )  
 Plaintiff )  
 )  
 v. )  
 )  
 Daniel C. Moss, )  
 Defendant. )

IN THE COURT OF COMMON PLEAS

CASE NO.  
 2019-CP-10-0496

MOTION AND ORDER INFORMATION  
 FORM AND COVER SHEET

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)	
<b>SECTION I: Hearing Information</b>	
Nature of Motion: Estimated Time Needed: Court Reporter Needed: <input type="checkbox"/> YES / <input type="checkbox"/> NO	
<b>SECTION II: Motion/Order Type</b>	
<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
<b>SECTION III: Motion Fee</b>	
<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:	
<b>JUDGE'S SECTION</b> <input type="checkbox"/> Motion Fee to be paid upon filing of the attached order. <input type="checkbox"/> Other:	_____ JUDGE  CODE: _____ Date: _____
<b>CLERK'S VERIFICATION</b>	
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*

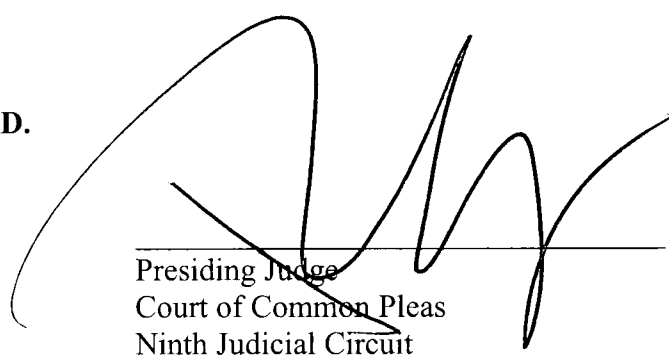
FILED  
2019 AUG 27 AM 9:48  
JULIE J. ARMSTRONG  
CLERK OF COURT

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 J. Hunter, Esquire, who represents the Plaintiff, be **GRANTED** admission *pro hac vice* in this case.

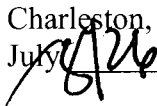
**AND IT IS SO ORDERED.**



\_\_\_\_\_

Presiding Judge  
Court of Common Pleas  
Ninth Judicial Circuit

Charleston, South Carolina  
July 26, 2019



STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF CHARLESTON )

IN THE COURT OF COMMON PLEAS  
NINTH JUDICIAL CIRCUIT

Civil Action No. 2019-CP-10-0496

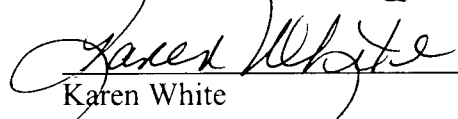
MEGAN A. JOHNSON, )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
DANIEL C. MOSS, )  
 )  
Defendant. )  
\_\_\_\_\_ )

CERTIFICATE OF SERVICE

FILED  
2019 AUG 27 AM 9:50  
JULIE J. ARMSTRONG  
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 J. Hunter, 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 19<sup>th</sup> 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 J. Hunter, 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

**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 William J. Hunter, applicant herein, and respectfully represents the following:

1. Applicant resides at:  
516 Wilmington Island Road  
 Street Address  
Savannah                      Chatham                      Georgia                      31410  
 City                                      County                                      State                                      Zip Code  
912-856-9469  
 Telephone

FILED  
CLERK OF COURT  
2019 AUG 27 AM 9:49  
WILLIAM J. ARTHUR

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  
 Street Address  
Savannah                      Chatham                      Georgia                      31401  
 City                                      County                                      State                                      Zip Code  
912-236-3311                      912-856-9469                      912-236-8725                      bhunter@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 2004, 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:
State of Georgia	2004
United States District Court, Southern District of Georgia	2004

Court:	Date Admitted:
United States Court of Appeals, Eleventh Circuit	2004
United States Court of Appeals, Federal Circuit	2006
Court of Appeals, Georgia	2009
Supreme Court, Georgia	2019

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 Dale Akins of the Akins Law Firm law firm, which has offices at:

<u>P.O. Box 1547</u>			
<u>Street Address</u>			
<u>Bluffton</u>	<u>Beaufort</u>	<u>South Carolina</u>	<u>29910</u>
<u>City</u>	<u>County</u>	<u>State</u>	<u>Zip Code</u>
<u>843-757-7574</u>		<u>843-757-7601</u>	<u>dakins@hargray.com</u>
<u>Primary Telephone</u>	<u>Cell Phone</u>	<u>Fax Number</u>	<u>Email Address</u>
<u>65092</u>			
<u>South Carolina Bar Number</u>			

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).

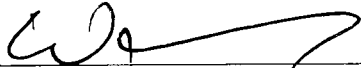
Yes. Please see attached additional pages. In addition, affiant believes to the best of his knowledge that the listed cases are the only South Carolina cases wherein he was admitted *pro hac vice*. To the extent there are others, affiant could not remember them or find any documentation about them in his files at the time of signing this affidavit. Moreover, affiant has never been denied *pro hac vice* admission.

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 16 day of July, 2019

  
\_\_\_\_\_  
APPLICANT



VERIFICATION

STATE OF Georgia )

COUNTY OF Chatham )

I, William J. Hunter, 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.

WM

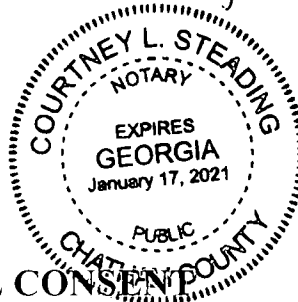
APPLICANT/AFFIANT

Subscribed and sworn to before me this 16 day of July, 20 19.

Courtney L. Steading

Notary Public for the State of Georgia

My Commission Expires: 11/17/2021



JULIE J. ARMSTRONG  
CLERK OF COURT

2019 AUG 27 AM 9:49

FILED

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, 20 19

[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, 20 19.

[Signature]

APPLICANT/AFFIANT

**Court:** State of South Carolina  
County of Beaufort

Court of Common Pleas  
Fourteenth Judicial Circuit

**Case Name:** Roy E. Malphrus, et al. v. Paul Andrew Slota, M.D., et al.

**Case No:** 2006-CP-07-02596

**Year of Application:** 2007

**Application was granted.**

**Court:** United States District Court  
District of South Carolina  
Anderson Division

**Case Name:** Graham Allen Enterprises, LLC & Robert G. Allen (a/k/a Graham Allen) v. Nine Line Apparel, Inc., et al.

**Case No.:** 8:17-2427-HMH

**Year of Application:** 2017

**Local Counsel:** Amy L.B. Hill  
Gallivan, White & Boyd, PA  
Post Office Box 7368  
Columbia, SC 29202

**Application was granted.**

**Court:** State of South Carolina  
County of Richland  
  
Court of Common Pleas  
Ninth Judicial Circuit

**Case Name:** Timothy Treon, et al. v. Dyrvit Systems, Inc., et al.

**Case No.:** 2008-CP-07-0774

**Year of Application:** 2010

**Local Counsel:** Thomas A. Pendarvis  
Pendarvis Law Offices, P.C.  
500 Carteret Street, Suite A  
Beaufort, SC 29902

**Application was granted.**



# State Bar of Georgia

*Lawyers Serving the Public and the Justice System*

**Mr. William J. Hunter**  
**Oliver Maner LLP**  
**218 West State Street**  
**PO Box 10186**  
**Savannah, GA 31412**

**CURRENT STATUS:** Active Member-Good Standing  
**DATE OF ADMISSION:** 10/26/2004  
**BAR NUMBER:** 141288  
**TODAY'S DATE:** 06/19/2019

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](http://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