

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
(Florence Division, DIVISION)

HOWARD K. STERN, as Executor of the Estate of Vickie Lynn Marshall, a/k/a Vickie Lynn Smith, a/k/a Vickie Lynn Hogan, a/k/a Anna Nicole Smith, Plaintiff/Petitioner/USA, v. STANCIL SHELLEY, a/k/a Ford Shelley, G. BEN THOMPSON, and John or Jane Doe 1-12 whose true names are unknown, Defendant/Respondent.

Case No. _____

Motion in Support of Pro Hac Vice Application

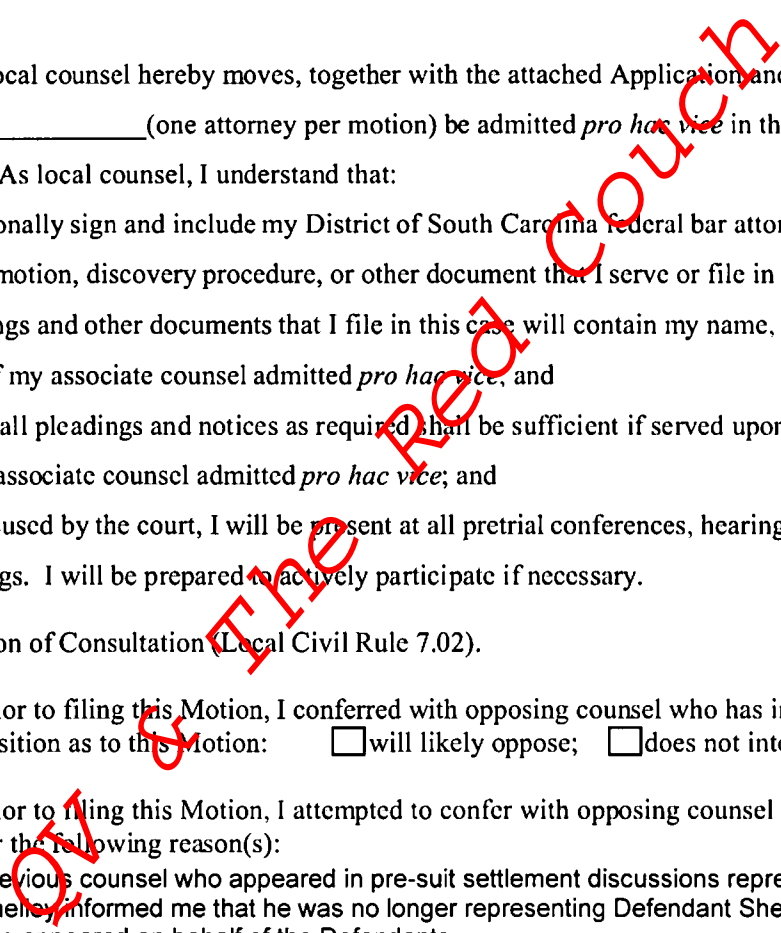
The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that Nicole Jennings Wade (one attorney per motion) be admitted pro hac vice in the above-captioned case as associate counsel. As local counsel, I understand that:

- 1. I will personally sign and include my District of South Carolina federal bar attorney identification number on each pleading, motion, discovery procedure, or other document that I serve or file in this court; and
2. All pleadings and other documents that I file in this case will contain my name, firm name, address, and phone number and those of my associate counsel admitted pro hac vice; and
3. Service of all pleadings and notices as required shall be sufficient if served upon me, and it is my responsibility to serve my associate counsel admitted pro hac vice; and
4. Unless excused by the court, I will be present at all pretrial conferences, hearings, and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.
5. Certification of Consultation (Local Civil Rule 7.02).

- Priority checkboxes for consultation: Prior to filing this Motion, I conferred with opposing counsel who has indicated the following position as to this Motion: [] will likely oppose; [] does not intend to oppose. [X] Prior to filing this Motion, I attempted to confer with opposing counsel but was unable to do so for the following reason(s): Previous counsel who appeared in pre-suit settlement discussions representing Defendant Shelley informed me that he was no longer representing Defendant Shelley. No other counsel has appeared on behalf of the Defendants. [] No duty of consultation is required because the opposing party is proceeding pro se.

Folkens Law Firm, P.A.
Firm Name
3326 West Palmetto Street
Street Address or Post Office Box
Florence, SC 29502-6139
City, State, Zip Code
843-665-0100
Telephone Number

Karl A. Folkens
Name of Local Counsel
[Signature]
Signature of Local Counsel
Local Counsel for the Plaintiff, Howard K. Stern
District of South Carolina
Federal Bar Number 854



UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
(Florence Division DIVISION)

HOWARD K. STERN, as Executor of the Estate of Vickie Lynn Marshall,
Plaintiff/Petitioner/USA,
v.
STANCIL SHELLEY, G. BEN THOMPSON, and Does 1-12,
Defendant/Respondent.

Case No. _____

Application/Affidavit for
Pro Hac Vice Admission

(1) Name. Nicole Jennings Wade
First Middle Last

(2) Residence. I reside in the following state: Georgia
If a South Carolina resident, indicate months/years of residence: _____

(3) Business Address. I am an attorney and practice law under the name of or as a member of the following firm:

Firm name: Powell Goldstein LLP
Mailing address: 1201 W. Peachtree Street NW, 14th Floor
Atlanta, GA, 30309
Telephone number:
Facsimile number: T: 404.572.6600 F: 404.572.6999
E-mail address: nwade@pogolaw.com

(Application will not be considered without an e-mail address to receive electronic notification.)

(4) Jurisdiction of this Court. I, by execution of this Application and Affidavit, consent and agree to comply with the applicable statutes, laws, and rules of the State of South Carolina, with all applicable federal statutes, laws, and rules, including Local Rules of the United States District Court for the District of South Carolina (particularly, Local Civil Rule 83.I.08 and/or Local Criminal Rule 57.I.08). I consent to the jurisdiction of the United States District Court for the District of South Carolina in all matters of attorney conduct.¹

(5) Regular Practice of Law. I am a member in good standing of the bar of the highest court of the District of Columbia or the State of Georgia where I regularly practice law. Attached is my certificate of good standing.

(6) Additional Bar Membership. I have been admitted to practice before the following courts: (List all of the 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.) By signing this Affidavit, I certify that I am a member in good standing of each of the listed bars unless otherwise noted.

¹ This District maintains a web site (www.scd.uscourts.gov) from which the federal and local rules of procedure and related materials may be obtained.

Court	Date Admitted	Good Standing
Georgia Court of Appeals (1995); United States Supreme Court (2008)		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
USDC Northern District of Georgia (2005); USDC Middle District of Georgia (1998)		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
United States Court of Appeals for the Eleventh Circuit (1997); United States Court of Appeals for the Fourth Circuit (1998)		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

(7) Pending Disciplinary Matters. Are you presently the subject of any formal suspension or disbarment proceedings, and have you been notified by any disciplinary agency of the initiation of formal procedures? Yes No
 (If "yes," give particulars, such as jurisdiction, court, date, grounds. Information to comply with this paragraph may be provided *in camera* but that fact shall be revealed below.)

(8) Curtailement of Prior Pro Hac Vice Admissions. Have you ever had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked?
 Yes No
 (If "yes," give particulars, such as date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation.)

(9) Sanctions. Have you ever had any certificate or privilege to appear and practice before any judicial or administrative body suspended or revoked, or received a public reprimand or greater sanction?
 Yes No
 (If "yes," give particulars, e.g., judicial or administrative body, date of suspension, and reinstatement.)

(10) Criminal Sanctions. Have you ever been convicted of a felony under the laws of the District of Columbia or of any State or under the laws of the United States?
 Yes No
 (If "yes," give particulars, such as date, court, judge, circumstances, and ultimate disposition.)

(11) Present and Previous Pro Hac Vice in this Court. Have you, within the last ten (10) years, filed an application to appear *pro hac vice* in the United States District Court for the District of South Carolina or another court in the state of South Carolina?
 Yes No
 (If "yes," give court, case name, docket number, and status of litigation, year of application, local counsel of record in each case, and state whether application is pending or was granted.) Attach additional pages if necessary.

(12) Designated Local Counsel. Local counsel of record associated with Applicant in this case is:

Attorney Name:	<u>Karl A. Folkens</u>
Firm Name:	<u>Folkens Law Firm, P.A.</u>
Street Address or Post Office Box:	<u>3326 West Palmetto Street</u>
City, State, and Zip Code:	<u>Florence, SC 29501</u>
Telephone Number:	<u>843.665.0100</u>
E-Mail Address:	<u>843.665.0500</u>

I understand that local counsel of record is required to: (1) personally sign each pleading, motion, discovery procedure, or other document served or filed in this Court; (2) accept service of all pleadings and notices as required on behalf of all counsel for the party represented; (3) be present at all pretrial conferences, hearings and trials, unless excused by the Court; (4) be prepared to participate actively as may be necessary; and (5) assure compliance with Local Civil Rules 83.1.04, 83.1.05, and 83.1.06 or Local Criminal Rules 57.1.04, 57.1.05, and 57.1.06 as appropriate. Local counsel of record may attend discovery proceedings.

- (13) Associated Counsel. In addition to local counsel designated above, the following counsel are also associated with the undersigned in this case.
L. Lin Wood; Luke A. Lantta; M. Krista Barth

- (14) Application Fee. I affirm that the application fee of two hundred and fifty dollars (\$250) has been paid in accordance with Local Civil Rule 83.1.05 or Local Criminal Rule 57.1.05 or paid herewith.

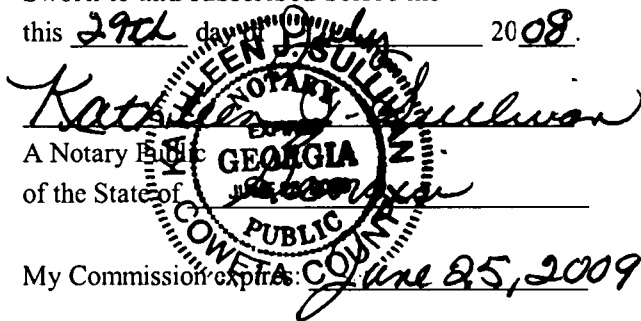
- (15) Electronic Notification. By submitting this application, I consent to electronic notification.

- (16) Represented Party/Parties. I seek to represent the following party/parties:
Plaintiff Howard K. Stern



 Signature of Applicant

Sworn to and subscribed before me
 this 29th day of July, 2008.



 A Notary Public
 of the State of Georgia
 My Commission expires June 25, 2009



Supreme Court
State of Georgia

STATE JUDICIAL BUILDING
Atlanta 30334

LEAH WARD SEARS, CHIEF JUSTICE
CAROL W. HUNSTEIN, PRESIDING JUSTICE
ROBERT BENHAM
GEORGE H. CARLEY
HUGH P. THOMPSON
P. HARRIS HINES
HAROLD D. MELTON
JUSTICES

THERESE S. BARNES, CLERK
JEAN RUSKELL, REPORTER

May 5, 2008

I hereby certify that Nicole Jennings Wade, Esq., was admitted on the 22nd day of May, 1996, as a member of the bar of the Supreme Court of Georgia, the highest court of this State; and, since that date she has been and is now a member of this bar in good standing, as appears from the records and files in this office.

Witness my signature and the seal of this Court hereto

affixed the day and year first above written.

Clerk, Supreme Court of Georgia

