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AUG 04 2023

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

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Appeal from Richland County  
Court of Common Pleas  
Jean Hoefer Toal, Circuit Court Judge

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Appellate Case No. 2023-001096  
Case No. 2022-CP-40-03834

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Donna B. Welch, individually and as Personal Representative of the Estate of Melvin G. Welch, deceased, Respondent,

v.

Advance Auto Parts, Inc., American Honda Motor Co., Inc., Atlas Asbestos Co, Atlas Turner, Inc. as successor to Atlas Asbestos Co, a foreign company, Bahnson, Inc., Covil Corporation; Daniel International Corporation, Davis Mechanical Contractors, Inc., Ellington Insulation Company, Inc., Fluor Constructors International f/k/a Fluor Corporation, Fluor Constructors International, Inc., Fluor Daniel Services Corporation, Fluor Enterprises, Inc., General Parts, Inc. individually and as successor-in-interest to Carquest Corporation, Goodrich Corporation f/k/a The B. F. Goodrich Company, The Goodyear Tire & Rubber Company, Graybar Electric Company, Inc., Honeywell International, Inc. individually and as successor-in-interest to Allied Signal, Inc., as successor to Bendix Corporation, Morse Tec LLC f/k/a Borgwarner Morse Tec LLC, and successor-by-merger to Borg-Warner Corporation, Occidental Chemical Corporation as successor to Durez Corporation, O'reilly Automotive Stores, Inc., Paramount Global f/k/a Viacomcbs Inc., f/k/a CBS Corporation, a Delaware corporation f/k/a Viacom, Inc., successor-by-merger to CBS Corporation, a Pennsylvania corporation, f/k/a Westinghouse Electric Corporation, Pneumo Abex LLC successor-in-interest to Abex Corporation, Redco Corporation f/k/a Crane Co., Reinz Wisconsin Gasket LLC f/k/a and/or successor to Reinz Wisconsin Gasket Co. and Wisconsin Gasket Manufacturing Co., a wholly owned subsidiary of Dco LLC, Rust Engineering & Construction, Inc., Rust International Inc., Southern Insulation, Inc., Spirax Sarco, Inc., Union Carbide Corporation, Westrock MWV, LLC individually and as successor-in-interest to Westvaco, ZF Active Safety US Inc. f/k/a Kelsey-Hayes Company, Defendants,

Of whom Atlas Turner, Inc., is the Appellant.

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S.C. SUPREME COURT

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**RESPONDENT'S MOTION FOR *PRO HAC VICE* ADMISSION OF  
KA'LEYA Q. HARDIN**

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Pursuant to RULE 240 AND RULE 404 OF THE SOUTH CAROLINA RULES OF APPELLATE PROCEDURE Ka'Leya Q. Hardin, through the undersigned counsel, moves to be admitted *Pro Hac Vice* before this Court in the above-entitled action, in order to participate as counsel for Respondent, and in support thereof, states:

1. That she is a member in good standing of the Mississippi State Bar, admitted before the court of last resort in that state, and has never been the subject of a disciplinary proceeding.

2. This motion is based upon the attached Verified Application for Admission *Pro Hac Vice* of Ka'Leya Q. Hardin, a copy of each of which is attached hereto and incorporated herein by reference.

WHEREFORE, the undersigned counsel for Respondent moves for the admission *Pro Hac Vice* of Ka'Leya Q. Hardin, as co-counsel in this matter.

August \_\_, 2023

s/Theile B. McVey  
Theile B. McVey (SC Bar 16682)  
[tmcvey@kassellaw.com](mailto:tmcvey@kassellaw.com)  
John D. Kassel (SC Bar 03286)  
[jkassel@kassellaw.com](mailto:jkassel@kassellaw.com)  
KASSEL MCVEY ATTORNEYS AT LAW  
1330 Laurel Street  
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Other email: [emoultrie@kassellaw.com](mailto:emoultrie@kassellaw.com)

Columbia, South Carolina

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**S.C. SUPREME COURT**

COPY

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

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Please type your answers in the space provided. Provide an answer for every question asked. In your own handwriting, sign in all spaces where a signature is required (no e-signatures). The accompanying certificate of good standing should not be older than 90 days at the time of the filing of this application.

Donna B. Welch, Individually and  
as Personal Representative of the  
Estate of Melvin G. Welch,  
deceased

Plaintiff

2023-001096

Case No.

South Carolina Court of Appeals  
Tribunal

vs.

Atlas Turner, Inc.

Defendant

Mailing Address of Tribunal:

1220 Senate Street  
Columbia, South Carolina 29201

Comes now Ka'Leya Q. Hardin, applicant herein, and respectfully represents the following:

1. Applicant resides at:

700 Meandering Drive  
Street Address  
Cedar Hill Dallas Texas 75104  
City County State Zip Code  
214-722-5990  
Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of)

Dean Omar Branham Shirley, LLP, with offices at  
302 N. Market Street, Suite 300

Dallas Dallas Texas 75202  
Street Address City County State Zip Code  
214-722-5990 601-310-4219 214-722-5991 khardin@dobslegal.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

Donna B. Welch, Individually and as Personal Representative of the Estate of Melvin G. Welch, deceased 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 September of 2011, 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 Mississippi where Applicant regularly practices law. Attached is a certificate of good

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10. Has Applicant previously filed an application to appear *pro hac vice* in South Carolina cases? If yes, 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.

Jerry Crawford v. Covil Corporation; case completed on appeal; 2/5/19; Theile McVey; Application granted.

11. Does Applicant agree to comply with the applicable statutes, laws and rules of the State of South Carolina and familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct? Does Applicant consent to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

Yes

12. Applicant respectfully requests to be admitted to practice in the above-named tribunal for this case only.

DATED this 14<sup>th</sup> day of July, 2023.

*[Signature]*  
APPLICANT

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VERIFICATION

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STATE OF Texas

COUNTY OF Dallas

S.C. SUPREME COURT

I, Ka'Leya Q. Hardin, 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.

Ka'Leya Q. Hardin  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 14<sup>th</sup> day of July, 20 23

[Signature]  
(Notary Signature)



Notary Public for the State of Texas

My Commission Expires: 12/06/2026

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 1<sup>st</sup> day of August, 20 23

[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~~ <sup>hand</sup> 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

2<sup>nd</sup> day of August, 20 23.

[Signature]  
APPLICANT/AFFIANT



THE MISSISSIPPI BAR

Post Office Box 2168  
Jackson, Mississippi 39225-2168  
Telephone (601) 948-4471  
Fax (601) 355-8635  
E-Mail info@msbar.org  
Website www.msbar.org

## *Letter of Good Standing*

TO WHOM IT MAY CONCERN:

*As of the date below, the attorney named is a member in good standing of The Mississippi Bar on **Active** status.*

**Ka'Leya Quinae Hardin**, Mississippi Bar Identification Number (103972) was admitted to practice law, **September 27, 2011**.

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**S.C. SUPREME COURT**

Date 07/12/2023

Amy S. Ward

Membership Records Coordinator

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Of whom Atlas Turner, Inc., is the Appellant.

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ORDER

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Theile B. McVey and John D. Kassel, of the firm Kassel McVey Attorneys at Law, move this Court for an order admitting Ka'Leya Q. Hardin, Esquire, *pro hac vice* in this case as co-counsel for the Respondent. The motion is GRANTED.

FOR THE COURT

BY: \_\_\_\_\_

CLERK

Columbia, South Carolina

cc:

Theile Branham McVey, Esquire  
John D. Kassel, Esquire  
Aaron D. Chapman, Esquire  
Stephen L. Brown, Esquire  
Russell G. Hines, Esquire  
James D. Gandy, III, Esquire  
Peter D. Protopapas, Esquire  
John K. Chandler, Esquire  
Brian M. Barnwell, Esquire