

THE STATE OF SOUTH CAROLINA
In the Supreme Court

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Feb 10 2025

S.C. SUPREME COURT

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
Jean Hoefler Toal, Acting Circuit Court Judge

Appellate Case No. 2023-001461
Circuit Court Case No. 2023-CP-40-01759

John A. Tibbs and Margaret B. Tibbs.....Respondents,

v.

3M Company; 4520 Corp., Inc.; A.O. Smith Corporation; A.W. Chesterton Company; ABB Inc.; Air & Liquid Systems Corporation; Aiw-2010 Wind Down Corp.; Amentum Environment & Energy, Inc.; Anchor/Darling Valve Company; Armstrong International, Inc.; Asbestos Corporation Limited; ASCO, L.P.; Atlas Asbestos Co; Atlas Turner, Inc.; AWT Air Company, Inc.; Bahnson, Inc.; Banner Industries International, Inc.; Banner Industries, LLC; Banner Industries Of N.E., Inc.; Barretts Minerals Inc.; Beaty Investments, Inc.; Bechtel Corporation; The Bonitz Company; Brand Insulations, Inc.; BW/IP Inc.; Canvas Ct, LLC; Cape PLC; Carboline Company; CB&I Laurens, Inc.; Cleaver-Brooks, Inc.; Consolidated Electrical Distributors, Inc.; Copes-Vulcan, Inc.; Covil Corporation; Crane Instrumentation & Sampling, Inc.; Crosby Valve, LLC; Daniel International Corporation; Davis Mechanical Contractors, Inc.; Dezurik, Inc.; Duke Energy Carolinas, LLC; Duke Energy Corporation; Eaton Corporation; Ellington Insulation Company, Inc.; Emerson Electric Co.; Fisher Controls International LLC; Flame Refractories, Inc.; Flowserve Corporation; Flowserve US Inc.; Fluor Constructors International; Fluor Constructors International, Inc.; Fluor Daniel Services Corporation; Fluor Enterprises, Inc.; FMC Corporation; Foster Wheeler Energy Corporation; Gardner Denver Nash, LLC; General Boiler Casing Company, Inc.; General Cable Corporation; General Cable Industries, Inc.; General Electric Company; Gould Electronics Inc.; Goulds Pumps, Incorporated; Goulds Pumps LLC; Great Barrier Insulation Co.; Grinnell LLC; Hajoca Corporation; Howden North America Inc.; HPC Industrial Services, LLC; IMO Industries Inc.; ITT LLC; Joy Global Underground Mining LLC; K-Mac Services Incorporated; Metropolitan Life Insurance Company; Mine Safety Appliances Company, LLC; MP Supply, Inc.; The

Nash Engineering Company; Occidental Chemical Corporation; Paramount Global; Patterson Pump Company; PECW Holding Company; Pfizer Inc.; Piedmont Insulation, Inc.; Plastics Engineering Company; Presnell Insulation Co., Inc.; Redco Corporation; Riley Power Inc.; Rockwell Automation, Inc.; RSCC Wire & Cable LLC; Schneider Electric USA, Inc.; Sequoia Ventures Inc.; Spirax Sarco, Inc.; SPX Corporation; Stafford Insulation Company; Standard Insulation Company Of N. C., Inc.; Starr Davis Company, Inc.; Starr Davis Company Of S.C., Inc.; Sterling Fluid Systems (USA) LLC; TE Wire & Cable LLC; Thermo Electric Company, Inc.; Union Carbide Corporation; Valves And Controls Us, Inc.; Velan Valve Corp.; Viking ump, Inc.; Vistra Intermediate Company LLC; The William Powell Company Wind Up, Ltd.; Yuba Heat Transfer LLC; Zurn Industries, LLC.....Defendants,

of which

Asbestos Corporation Limited is the.....Appellant.

MOTION TO APPEAR *PRO HAC VICE*

COMES NOW Theodore L. Manos, an attorney admitted to practice before this Court, in accordance with SC Judicial Branch. Rule 404 *Admission Pro Hac Vice and Appearances by Non-South Carolina Lawyers in Arbitration, Mediation or other Alternative Dispute Resolution Proceedings in South Carolina* the undersigned respectfully moves for the admission *pro hac vice* of Amir C. Tayrani of the law firm of Gibson, Dunn & Crutcher, LLP in Washington D.C. for appearance as co-counsel on behalf of *Amici Curiae* Certain Underwriters at Lloyd’s and Certain London Market Insurance Companies in the above action.

1. Attached hereto as Exhibit “A” and incorporated herein by reference is the Verified Application of Amir C. Tayrani setting forth the qualifications required by this Court for admission *pro hac vice*.

2. Attached hereto as Exhibit “B” and incorporated herein by reference is a Certificate of Good Standing.

3. The Office of Bar Admissions is in receipt of the applicant’s Verified Application to be admitted *pro hac vice* in the above action, along with the \$250.00 filing fee as of February 10, 2025, and its certification of the same is pending.

4. As local counsel, I will personally sign and include my South Carolina bar attorney identification number on any document that I serve or file in this court; and any documents that I file with the Court will contain my name, firm name, address, and phone number and those of my associate counsel admitted *pro hac vice*.

5. Therefore, this Court is respectfully moved to admit Amir C. Tayrani *pro hac vice*, to be associated with movant, and that the oath for admission to the Bar and payment of any fees be waived.

WHEREFORE, Theodore L. Manos, on behalf of Amir C. Tayrani, moves this Court to enter an Order permitting Amir C. Tayrani, to appear before this Court on behalf of *Amici Curiae* Certain Underwriters at Lloyd’s and Certain London Market Insurance Companies, for the purpose of participating in oral argument scheduled for February 11, 2025, in the above action.

/s/Theodore L. Manos

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**Attorneys for *Amici Curiae* Certain Underwriters
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Companies**

February 10, 2025

Charleston, South Carolina