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Feb 10 2025

S.C. SUPREME COURT

EXHIBIT A

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

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.

<u>John A. Tibbs & Margaret B. Tibbs</u> Plaintiff	<u>No. 2023-001461</u> Case No.	<u>South Carolina Supreme Court</u> Tribunal
vs.		
<u>3M Company, et al.</u> Defendant	Mailing Address of Tribunal:	<u>P.O. Box 11330</u> <u>1231 Gervais St.</u> <u>Columbia, SC 29201</u>

Comes now Amir C. Tayrani, applicant herein, and respectfully represents the following:

1. Applicant resides at:
209 S. Fairfax Street
Street Address
Alexandria City of Alexandria Virginia 22314
City County State Zip Code
(202) 230-4224
Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Gibson, Dunn & Crutcher LLP, with offices at 1700 M Street, N.W.
Street Address
Washington DC 20036-4504
City County State Zip Code
(202) 887-3692 atayrani@gibsondunn.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 Certain Underwriters at Lloyd's, London and certain London market insurance companies ("CLMI") 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 January 10 of 2005, 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 N/A 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. It is not necessary to provide a certificate of good standing from all courts before which you are admitted.

5. List all courts before which Applicant has been admitted to practice law, including United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and state courts or the District of Columbia.

Court:	Date Admitted:
District of Columbia (#490994)	1/10/05
California (#229609)	12/23/03
U.S. Supreme Court	2/20/07
U.S. Court of Appeals for the Second Circuit	1/25/11
U.S. Court of Appeals for the Third Circuit	6/4/18
U.S. Court of Appeals for the Fourth Circuit	2/10/14
U.S. Court of Appeals for the Fifth Circuit	7/24/08
U.S. Court of Appeals for the Sixth Circuit	10/4/05
U.S. Court of Appeals for the Seventh Circuit	6/8/06
U.S. Court of Appeals for the Ninth Circuit	8/1/05
U.S. Court of Appeals for the Tenth Circuit	8/19/14
U.S. Court of Appeals for the Eleventh Circuit	3/30/16
U.S. Court of Appeals for the D.C. Circuit	11/3/09
U.S. Court of Appeals for the Federal Circuit	10/22/07
U.S. District Court for the District of Columbia	6/6/11
U.S. District Court for the Central District of California	3/13/06
U.S. District Court for the Northern District of California	5/21/09
U.S. District Court for the Southern District of California	2/10/21

Is Applicant presently a member in good standing of the bars of those courts listed above? List any court named in the preceding paragraph that applicant is no longer admitted to practice before.

Yes.

6. Is Applicant presently subject to any suspension or disbarment proceedings, or has Applicant been formally notified of any complaints pending before a disciplinary agency? If yes, give particulars, e.g., jurisdiction, court date.

No.

7. Has Applicant had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked? If yes give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation.

No.

8. Has Applicant had any certificate or privilege to appear and practice before any court or administrative body suspended or revoked? If yes, give particulars, e.g., date, court, administrative body, date of suspension and reinstatement.

No.

9. Please be aware that local counsel must be Rule 403 certified. Local counsel of record associated with Applicant in this case is Theodore L. Manos of the Robertson, Hollingsworth, Manos & Rahn law firm, which has offices at:

40 Calhoun Street, Suite 330

Street Address

Charleston

Charleston

SC

29401

City

County

State

Zip Code

(843) 723-6470

Primary Telephone

Cell Phone

Fax Number

tlm@roblaw.net

Email Address

8660

South Carolina Bar Number

(You must provide Bar Number)

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.

No

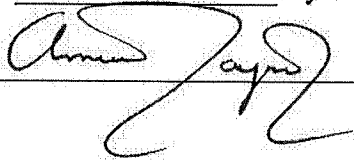
11. Does Applicant agree to comply with the applicable statutes, laws and rules of the State of South Carolina and familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct? Does Applicant consent to the jurisdiction of the South Carolina courts and Commission on Lawyer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

Yes.

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

DATED this 6th day of February, 2025

APPLICANT



VERIFICATION

STATE OF District of Columbia)

COUNTY OF Washington)

I, Amir C. Tayrani, 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.

Amir C. Tayrani
APPLICANT/AFFIANT

Subscribed and sworn to before me this 6th day of February, 20 25

Anita M. Watson
(Notary Signature)

District of Columbia
Signed and sworn to (or affirmed) before me
on 2-26-25 by Amir Tayrani
Date Name(s) of individual(s) making statement
Anita M. Watson
Signature of Notarial Officer

Notary Public for the State of District of Columbia

My Commission Expires: _____

Anita M. Watson - Notary Public, District of Columbia
My Commission Expires September 30, 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 7th day of February, 20 25
[Signature] SC Fed Ct. Bar 05918
LOCAL COUNSEL OF RECORD

with expressed permission by Theodore L. Manos
SC State Bar: 8660
Fed. Bar: 7023

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 7th day of February, 20 25

E. Lisa J. Leslie

EXHIBIT B

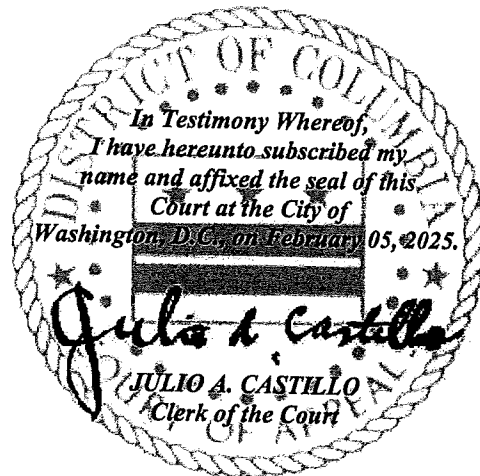


DC BAR

*On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals,
the District of Columbia Bar does hereby certify that*

Amir Cameron Tayrani

*was duly qualified and admitted on January 10, 2005 as an attorney and counselor entitled to
practice before this Court; and is, on the date indicated below, an Active member in good
standing of this Bar.*



Issued By:

A handwritten signature in black ink, appearing to read "David Chu".

David Chu - Director, Membership
District of Columbia Bar Membership

*For questions or concerns, please contact the D.C. Bar Membership Office at 202-626-3475 or email
memberservices@dcbbar.org.*