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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
Jean H. Toal, Circuit Court Judge

Appellate Case No. 2024-001550
Civil Action No. 2023-CP-40-04072

Michael L. Perry and Lonnie Long, Respondents,

v.

American Industrial Industries, et al.

Of which American Industrial Industries is theAppellant.

**RESPONDENTS' MOTION FOR *PRO HAC VICE* ADMISSION OF
MISTY A. FARRIS**

Pursuant to RULE 240 AND RULE 404 OF THE SOUTH CAROLINA RULES OF APPELLATE PROCEDURE, Misty A. Farris, 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 Respondents, and in support thereof, states:

1. That she is a member in good standing of the Texas 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 Misty A. Farris, a copy of each of which is attached hereto and

incorporated herein by reference.

WHEREFORE, the undersigned counsel for Respondents moves for the admission *Pro Hac Vice* of Misty A. Farris, as co-counsel in this matter.

s/Theile B. McVey
Theile B. McVey (SC Bar 16682)
tmcvey@kassellaw.com
John D. Kassel (SC Bar 03286)
jkassel@kassellaw.com
Jamei Rae Rutkoski (SC Bar No.: 103270)
KASSEL MCVEY ATTORNEYS AT LAW
1330 Laurel Street
Post Office Box 1476
Columbia, South Carolina. 29202-476
Telephone: 803-256-4242
Facsimile: 803-256-1952
Other email: emoultrie@kassellaw.com

March 27, 2025

Columbia, South Carolina

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VERIFIED APPLICATION FOR ADMISSION PRO HAC VICE
IN THE STATE OF SOUTH CAROLINA S.C. SUPREME COURT

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.

Michael L. Perry and Lonnie Long
Plaintiff

2024-001550
Case No.

South Carolina Court of Appeals
Tribunal

vs.

American International Industries
Defendants.

Mailing Address of Tribunal: 1220 Senate Street
Columbia, South Carolina 29201

Comes now Misty A. Farris, applicant herein, and respectfully represents the following:

1. Applicant resides at:

4810 Tremont St.

Street Address

Dallas
City
214-738-4514
Telephone

Dallas
County

Texas
State

75246
Zip Code

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

Street Address

Dallas
City
214-722-5990
Primary Telephone

Dallas
County
214-738-4514
Cell Phone

Texas
State
214-722-5991
Fax Number

75202
Zip Code
mfarris@dobslegal.com
Email Address

3. Applicant has been retained personally or as a member of the above-named law firm by

Michael L. Perry and Lonnie L. Long 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 November of 1996, 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 Texas 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:
Texas	11/1/1996
Northern District of Texas	9/8/2000
Supreme Court of the United States	8/26/2002
Court of Appeals, Third Circuit	10/7/2016
Southern District of Texas	9/5/2019
District of Minnesota	8/12/2020
Court of Appeals, Fourth Circuit	05/21/2021
Court of Appeals, Ninth Circuit	03/15/2024

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 Theile McVey of the Kassel McVey

law firm, which has offices at:

1330 Laurel Street, P.O. Box 1476
Street Address

<u>Columbia</u> City	<u>Richmond</u> County	<u>SC</u> State	<u>29202</u> Zip Code
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<u>803-256-4242</u> Primary Telephone	<u>803-582-7070</u> Cell Phone	<u>803-256-1952</u> Fax Number	<u>tmcvey@kassellaw.com</u> Email Address
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16682

16682

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.

Applicant is filing a simultaneous Application for *Pro Hac Vice* in *Perry v. American International Industries*, Appellate Case No. 2025-000065. The case is currently pending in the South Carolina Court of Appeals. The application is dated March 7, 2025. Local counsel is Theile McVey. Other than the application listed above, Applicant has not previously filed any other applications to appear *pro hac vice* in a South Carolina case.

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 7th day of March, 2025

Misty James
APPLICANT

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S.C. SUPREME COURT

VERIFICATION

STATE OF Texas)

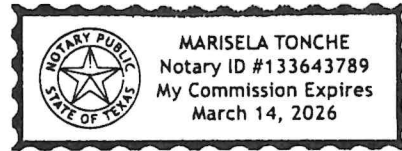
COUNTY OF Dallas)

I, Misty A. Farris, 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.

Misty Farris
APPLICANT/AFFIANT

Subscribed and sworn to before me this 7th day of March, 2025

[Signature]
(Notary Signature)



Notary Public for the State of Texas
My Commission Expires: March 14, 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 10 day of March, 2025

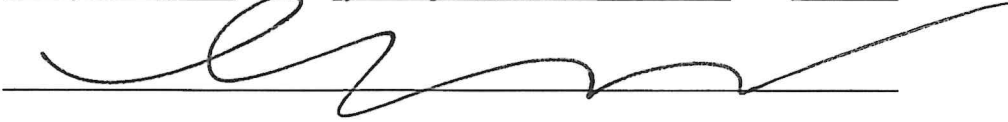
[Signature]
LOCAL COUNSEL OF RECORD



CERTIFICATE OF SERVICE

~~mail~~ ^{hand} I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by
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

10th day of March, 20 25



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The Supreme Court of Texas

AUSTIN
CLERK'S OFFICE

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S.C. SUPREME COURT

I, **BLAKE HAWTHORNE**, Clerk of the Supreme Court of Texas, certify that the records of this office show that

Misty Ann Farris

was duly admitted and licensed as an attorney and counselor at law by the Supreme Court of Texas on the 1st day of November, 1996.

I further certify that the records of this office show that, as of this date

Misty Ann Farris

is presently enrolled with the State Bar of Texas as an active member in good standing.

IN TESTIMONY WHEREOF witness my signature



and the seal of the Supreme Court of Texas at the City of Austin, this, the 23th day of January, 2025.

BLAKE HAWTHORNE, Clerk

Blake A. Hawthorne
Clerk, Supreme Court of Texas

No. 5963C.1



The Supreme Court of South Carolina

Office of Bar Admissions

PATRICIA A. HOWARD
CLERK OF COURT

KATHLEEN "TINA" BRYANT
MANAGER, OFFICE OF BAR
ADMISSIONS

POST OFFICE BOX 11330
COLUMBIA, SOUTH CAROLINA 29211
TELEPHONE: (803) 734-1317
FAX: (803) 734-0394

March 19, 2025

The Honorable Jenny Abbott Kitchings
Clerk of Court
P.O. Box 11629
Columbia, SC 29211

RE: Michael L. Perry, et al. v. American International Industries

Appellate Case No: 2024-001550

Dear Ms. Kitchings:

I certify that the Office of Bar Admissions has received a verified application requesting Misty A. Farris be admitted *pro hac vice* in the above matter. The \$250 filing fee for the applicant has been paid.

Sincerely,

M.J. Thames
Bar Admissions Coordinator

cc: Misty A. Farris
Theile B. McVey