

**RECEIVED**

**Mar 27 2025**

**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. 2025-000065  
Civil Action No. 2023-CP-40-04072

---

Michael L. Perry and Lonnie Long, ..... Respondents,

v.

American Industrial Industries, et al.

Of whom Johnson & Johnson; LLT Management, LLC f/k/a LTL Management, LLC;  
Kenvue, Inc.; and Johnson & Johnson Holdco (NA), Inc. are the..... Appellants.

---

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

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)  
Jamie Rae Rutkoski (SC Bar 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](mailto:emoultrie@kassellaw.com)

March 27, 2025

Columbia, South Carolina

COPY

RECEIVED

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

MAR 10 2025

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                      2025-000065                      South Carolina Court of Appeals  
Plaintiff    Case No.    Tribunal  
vs.

Johnson & Johnson;  
LLT Management, LLC f/k/a LTL  
Management, LLC; Kenvue, Inc.; and  
Johnson & Johnson Holdco (NA), Inc  
Defendants.    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  
Street Address  
Dallas                      Dallas                      Texas                      75202  
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  
Michael L. Perry and Lonnie 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 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 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:
Mississippi	09/2011
West Virginia	02/2015
Southern District of West Virginia	09/2015
U.S. Court of Appeals, Ninth Circuit	10/2019

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

Columbia                      Richmond                      SC                      29202  
City                                  County                                  State                                  Zip Code

803-256-4242                      803-582-7070                      803-256-1952                      tmcvey@kassellaw.com  
Primary Telephone                      Cell Phone                                  Fax Number                                  Email Address

16682  
South Carolina Bar Number  
(You must provide Bar Number)

**RECEIVED**

**MAR 10 2025**

**S.C. SUPREME COURT**

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.

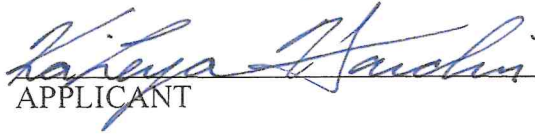
See attached.

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 5<sup>th</sup> day of March, 2025

  
APPLICANT

**RECEIVED**  
MAR 10 2025  
S.C. SUPREME COURT

VERIFICATION

RECEIVED

MAR 10 2025

STATE OF Texas )

COUNTY OF Dallas )

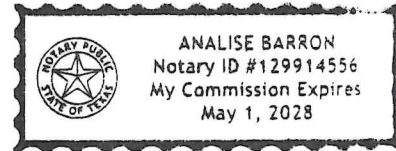
S.C. SUPREME COURT

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 5th day of March, 20 25

Analise Barron  
(Notary Signature)



Notary Public for the State of Texas  
My Commission Expires: 5-1-28

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 2th day of March, 20 25

[Signature]  
LOCAL COUNSEL OF RECORD

CERTIFICATE OF SERVICE

hand 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 10th day of March, 20 25

[Signature]

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.

Case Name	Status of Litigation	Date of Application	Local Counsel of Record	Application Pending or Granted
<i>Jerry Crawford v. Covil Corporation,</i> No. 2018-001965	Appeal completed	5/5/19	Theile McVey	Granted
<i>Melvin Welch v. Atlas Turner, Inc.,</i> No. 2023-001096	Pending	7/14/23	Theile McVey	Granted
<i>John A. Tibbs, et al. v. Asbestos Corporation Limited</i> No. 2023-001461	Pending	11/10/23	Theile McVey	Granted

**RECEIVED**  
 MAR 10 2025  
 S.C. SUPREME COURT



THE MISSISSIPPI BAR

Post Office Box 2168  
Jackson, Mississippi 39225-2168  
Telephone (601) 948-4471  
Fax (601) 355-8635  
E-Mail [info@msbar.org](mailto:info@msbar.org)  
Website [www.msbar.org](http://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**.

Amy S. Ward  
Membership Records Coordinator

Date 01/22/2025

**RECEIVED**

**MAR 10 2025**

**S.C. SUPREME COURT**





# 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. Johnson & Johnson, et al.

Appellate Case No: 2025-000065

Dear Ms. Kitchings:

I certify that the Office of Bar Admissions has received a verified application requesting Ka'Leya Q. Hardin 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: Ka'Leya Q. Hardin  
Theile B. McVey