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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. 2024-001997
Civil Action No. 2022-CP-40-01265

Sarah J. Plant and Parker Plant,Respondents,

v.

Avon Products, Inc., et al.

Of which IMI Fabi (Diana) LLC; IMI Fabi (USA) Inc.; and
IMI Fabi, LLC are theAppellants.

**RESPONDENTS' MOTION FOR *PRO HAC VICE* ADMISSION OF
BEVERLY K. CHAPMAN**

Pursuant to RULE 240 AND RULE 404 OF THE SOUTH CAROLINA RULES OF APPELLATE PROCEDURE, Beverly K. Chapman, 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 Illinois 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 Beverly K. Chapman, a copy of which is attached hereto and

incorporated herein by reference.

WHEREFORE, the undersigned counsel for Respondents moves for the admission *Pro Hac Vice* of Beverly K. Chapman, as co-counsel in this matter.

Theile B. McVey (SC Bar 16682)
tmcvey@kassellaw.com
John D. Kassel (SC Bar 03286)
jkassel@kassellaw.com
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

May ____, 2025

Columbia, South Carolina

COPY

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>Sarah J. Plant and Parker Plant</u> Plaintiff	<u>2024-001997</u> Case No.	<u>South Carolina Court of Appeals</u> Tribunal
vs.	Mailing Address of Tribunal:	<u>1220 Senate Street</u>
<u>IMI Fabi (Diana), LLC, IMI Fabi</u> <u>(USA), Inc., and IMI Fabi, LLC</u> Defendant		<u>Columbia, South Carolina 29201</u>

Comes now Beverly K. Chapman, applicant herein, and respectfully represents the following:

1. Applicant resides at:
3600 Smoothstone Drive
 Street Address
Plano Collin Texas 75074
 City County State Zip Code
708-227-5108
 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
1801 North Lamar Street, Suite 300
 Street Address
Dallas Dallas Texas 75202
 City County State Zip Code
214-722-5990 708-227-5108 214-722-5991 bchapman@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 Sarah J. Plant and Parker Plant 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 23rd of December, 2014, 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 Illinois 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.

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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:
Eastern District of Texas	06-27-2018
Fifth Circuit Court of Appeals	09-05-2018

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. Fifth Circuit admission contingent on government employment and will be inactive soon.

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 Attorneys at Law 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

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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.

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 May, 2025

Beverly K. Chapman
APPLICANT

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S.C. SUPREME COURT

VERIFICATION

STATE OF TEXAS)

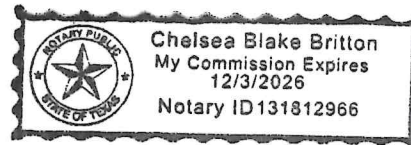
COUNTY OF DALLAS)

I, Beverly K. Chapman, 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.

Beverly K. Chapman
APPLICANT/AFFIANT

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

Chelsea Britton
(Notary Signature)



Notary Public for the State of Texas

My Commission Expires: 12-3-26

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 14 day of May, 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

14th day of May, 20 25

[Signature]

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S.C. SUPREME COURT

Certificate of Admission To the Bar of Illinois

I, Cynthia A. Grant, Clerk of the Supreme Court of Illinois, do hereby certify that

Beverly Kristyne Chapman

has been duly licensed and admitted to practice as an Attorney and Counselor at Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on 12/23/2014 and is in good standing, so far as the records of this office disclose.

IN WITNESS WHEREOF, I have hereunto
subscribed my name and affixed the
seal of said Court, this 24th day of
April, 2025.

Cynthia A. Grant

Clerk,
Supreme Court of the State of Illinois



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S.C. SUPREME COURT

Certificate of Admission To the Bar of Illinois

I, Cynthia A. Grant, Clerk of the Supreme Court of Illinois, do hereby certify that

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has been duly licensed and admitted to practice as an Attorney and Counselor at Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on 12/23/2014 and is in good standing, so far as the records of this office disclose.

IN WITNESS WHEREOF, I have hereunto
subscribed my name and affixed the
seal of said Court, this 25th day of
April, 2025.

Cynthia A. Grant

Clerk,
Supreme Court of the State of Illinois

